

Category: Environmental Values

Section: Environmental Values General

PC #: 576

Public Concern: The FS should develop minimum criteria for grizzly bear security. See 588/14 for specifics.

Sample Statement:

Finding AM-A5: Minimum criteria for grizzly bear security requirements must be developed. If they determine significant constraints on formulation of land use alternatives, then the prescription must become an allocation at some minimal level from which legal alternatives can be formulated. Modifications made to current Forest Plans through amendments alleged to be insignificant has in practice turned out to be major forest plan revision...Endangered species management is a wild card that appears to eliminate any possibility of predictability of public benefits on National Forests. Perhaps this should be the number one issue to drive the development of alternatives for analyzing predictability for uses and outputs from the National Forest, especially the Flathead National Forest. If the requirements for the various listed species means that no multiple use of Federal Lands can occur, then be honest and tell the public and Congress the portions of the National Forests are required to be allocated to recover the various listed species and where, if any, land is left for multiple use. Over 18 years ago, the Flathead allocated a sizeable portion of land in the North Fork to emphasize Grizzly Bear Management and Research. To our knowledge no active management of any kind has taken place and apparently the model is to keep as many people out as possible and eventually for it to burn. If that is the "best science" for grizzly bear management, then that is the management that should be described and allocated as necessary to recover the bear and people will then know what to expect. (Multiple Use or Land Rights, Bigfork, MT - #588)

PC #: 536

Public Concern: The Forest Service should prioritize species and habitats for maintenance and improvement.

Sample Statement:

The plan should review habitat maintenance, improvements, and objectives, however limiting them to priority species and habitats. (Individual, Roosevelt, UT - #33)

Sample Statement:

Action EM-F5-A1: (We propose to identify linkage zones at the landscape scale to facilitate species movement and genetic exchange.) I support linkage zones for the purposes so stated. (Individual, No Address - #53)

PC #: 148

Public Concern: The Forest Service should develop restoration strategies.

Sample Statement:

Action EM-F11-A1: (We propose that each forest develop restoration strategies that: a. Identify areas such as watersheds or landscapes having the highest potential for improving ecosystem components through passive and active restoration: b.. Are flexible with changing resource conditions and new information .c. Maintain areas having high ecological integrity d. Integrate aquatic, riparian, upland forest, shrub land and grassland components. e. Consider disturbance processes and patterns such as fire, insects, disease, wind throw and invasive species .f. Improve social and economic conditions .g. Contribute to recovery of listed species .h. Integrate State Total Maximum Daily Load (TMDL) programs. i. Facilitate collaboration with external partners.)I agree but am dubious why social and economic conditions should be a driver in an Ecosystem management proposed action. (Individual, No Address - #53)

Sample Statement:

establish wildland restoration areas in the Northern Rockies Ecosystem Protection Act which will create high paying jobs while restoring damaged watersheds. (Individual, No Address - #204)

Sample Statement:

(for the benefit of future generations)identify and establish restoration in areas where damage has occurred due to excessive logging and roadbuilding. Protect and restore watershed and habitat. (Individual, Bigfork, MT - #211)

PC #: 538

Public Concern: The Forest Service should select its Management Indicator Species, based on habitat types.

Sample Statement:

EM-F8-A1 (We propose to update our management indicator species to better reflect the effects of management activities and to promote consistency where appropriate). The table of indicator species shows predominantly old growth, aquatic and threatened/endangered species. When you select the new indicators, I suggest finding indicators of the different forest habitat types, from open meadow to old growth, terrestrial and aquatic species. Game species don't seem appropriate as indicators unless they are confined to one type of habitat or on the brink of being sensitive species. (Individual, Missoula, MT - #510)

PC #: 594

Public Concern: Consider all parts of the ecosystem in the planning process.

Sample Statement:

The above discussion speaks to the need to emphasize - sincerely - the objective of ecological integrity. I spend much time in the woods, and I see that very little old-growth is left, making a true ecological "mosaic" next to impossible. We need significant representation of all the parts for integrated function and composition in forestlands. (Individual, Hot Springs, MT - #516)

PC #: 540

Public Concern: The Forest Service should consider motorized use when developing wildlife habitat management direction.

Sample Statement:

Our forest should be managed in a way that creates a balance of wildlife health and motorized use. (Individual, No Address - #396)

PC #: 150

Public Concern: The Forest Service should protect the plants and animals, water quality, old growth, and special places.

Sample Statement:

There are lots of folks out here who love the wilderness, the quiet and peace, not to mention all the animals and plants you will see nowhere else. If those of you who have power and authority don't save these things, who will. It is your responsibility to be good stewards of the land and wild places, if they go so does humankind. (Individual, Missoula, MT - #546)

Sample Statement:

While this region is feeling the pressures of rapid development on private land, it is crucial to protect and preserve the unique public resources making this region attractive. (Preservation/Conservation, Boulder, MT - #576)

Sample Statement:

These special places should be protected in order to provide fish and wildlife habitat, clean water, backcountry recreation, and other important values. All of our wild National Forests should be protected from commercial logging, road construction and other damaging activities. (Individual, Billings, MT - #714)

Sample Statement:

Most infuriating is the "fear factor" that has been used to feed corporate and political greed. The public is well aware that the forests have been mismanaged and affected by drought and that the result is immense fire, risk and susceptibility to disease. But, the mandate should, be really good, forest management, with an absolute commitment preservation of wildlands. Extractive industries need not be left out of this process, but the priority must be an intact ecosystem. (Individual, Arlee, MT - #39)

Sample Statement:

Improve water quality, protect old growth forests, and increase secure wildlife habitat. (Individual, No Address - #365)

PC #: 153

Public Concern: The Forest Service should display where human needs or species

needs are the top priority in the different management areas.

Sample Statement:

Action EM-F1-A1 (We propose to use sustainability and viability as the underlying ecosystem management principles. We propose to use these principles to provide for human needs and to conserve species for present and future generations). Often, human needs and species' needs conflict. If the Management area designations stay, then list in which areas human needs take priority and which species' needs. (Individual, Missoula, MT - #510)

PC #: 160

Public Concern: The Forest Service's foundation for this Forest plan should be watershed integrity and ecosystem health.

Sample Statement:

I sincerely hope the foundation for this Forest plan will be watershed integrity and ecosystem health I hope with all management decisions, policies, regulations and projects, these basis tenets will be the first considerations. (Individual, Stevensville, MT - #524)

PC #: 161

Public Concern: The Forest Service should use ecosystem management.

Sample Statement:

These definitions I support...Ecosystem Management Put simply it is to consider social, economic, and ecological principles in man ecosystems to restore or sustain ecological integrity, and to provide for the values, products, uses, and services for the long term. Scientific Framework, Analysis of Management Situation, 2/11/04. (Individual, Stevensville, MT - #524)

Sample Statement:

In general, we support your efforts to place primary emphasis on ecosystem management as the basis of forest management. We believe that broadening the definitions of ecosystem management and sustainability to include social, economic and ecological processes will better serve society and the fish, wildlife and recreation resources we look to our forests to provide. (State Agency or Official, Missoula, MT - #697)

PC #: 151

Public Concern: Forest Service restoration strategies should strongly consider improving social and economic conditions.

Sample Statement:

Action EM-F11-A1: (We propose that each forest develop restoration strategies that: a. Identify areas such as watersheds or landscapes having the highest potential for improving ecosystem components through passive and active restoration .b. Are flexible with changing resource conditions and new information .c. Maintain areas having high ecological integrity d. Integrate aquatic, riparian, upland forest, shrub land and grassland components. e. Consider disturbance processes and patterns such as fire, insects, disease, wind throw and invasive species .f. Improve social and economic conditions. g. Contribute to recovery of listed species. h. Integrate State Total Maximum Daily Load (TMDL) programs. i. Facilitate collaboration with external partners.)The proposal to "Identify areas such as watersheds or landscapes having the highest potential for improving ecosystem components through passive and active restoration." appears to have some potential to affect decisions space analysis, and should have been done as part of the AMS. The statement to develop strategies to improve social and economic conditions is extremely important and should be public issue number 2 right behind the extreme fire hazard issue. (Multiple Use or Land Rights, Bigfork, MT - #588)

Subconcern:

WATERSHED PROTECTION AND RESTORATION SHOULD SUPPORT FUTURE SUSTAINABLE POPULATIONS OF NATIVE AQUATIC SPECIES.

Subconcern:

THE FOREST SERVICE SHOULD DEFINE HYDROLOGIC INTEGRITY AS A NETWORK OF STREAMS, ALONG WITH THEIR GROUNDWATER ECOSYSTEMS, WITHIN THE BROADER LANDSCAPE WHERE THE UPLAND, FLOODPLAIN, AND RIPARIAN AREAS HAVE RESILIENT VEGETATION,....(SEE STATEMENT)

Subconcern:

THE FOREST SERVICE SHOULD PROTECT HIGH QUALITY STREAMS AS MODELS FOR REFERENCE CONDITIONS.

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Subconcern:

THE FOREST SERVICE SHOULD PROVIDE WATER YIELD MEASUREMENT FROM FOREST LANDS.

Subconcern:

THE FOREST SERVICE SHOULD MANAGE STREAMS SO NO POLLUTION IS ACCEPTABLE AND IS CONTROLLED USING ADAPTIVE MANAGEMENT BMPS.

Subconcern:

THE FOREST SERVICE SHOULD USE LIMITED FUNDS TO WORK ON THE WORST AREAS FIRST

PC #: 157

Public Concern: The Forest Service should consider aviation as one of the lowest impact means of access affecting sustainability and viability.

Sample Statement:

Action EM-F1-A1: (We propose to use sustainability and viability as the underlying ecosystem management principles. We propose to use these principles to provide for human needs and to conserve species for present and future generations.)
Action EM-FI-AI :We propose to use sustainability and viability² as the underlying ecosystem management principles. We propose to use these principles to provide for human needs and to conserve species for present and future generations. [[Different methods of forest access have different levels of sustainability and viability over time. These should be addressed in the plan. Aviation has one of the lowest levels of effect on the environment.]] (Recreational, Kalispell, MT - #268)

PC #: 162

Public Concern: The Forest Service should manage the Lolo Creek corridor for its tremendous historic, scenic, and recreational values.

Sample Statement:

Plum Creek properties have been extensively harvested and we believe Lolo NF lands should be managed in this context. The Lolo Creek corridor has tremendous historic, scenic, and recreational value. The LWG advocates that adjacent NF lands be managed with this in mind. (Preservation/Conservation, Lolo, MT - #609)

PC #: 163

Public Concern: The Forest Service should include in its restoration strategy, the removal of water bodies from the Montana State Integrated Report, Clean Water Act, 1996 303(d) list, as soon as possible.

Sample Statement:

EM-F11: Reason: Again this finding emphasizes impaired streams, aquatic and terrestrial species. The health of these components of an ecosystem are the result of watershed condition. The health of the whole watershed is the issue. Suggestion: Change wording of second paragraph under Finding EM-F11 to read: There is a need to restore the watershed and its ecological components. Restoration activities will be given the highest priority in use of funds. In addition, restoration work needs to be integrated with other project work as it occurs. Action EM-F11-A1: (We propose that each forest develop restoration strategies that :a. Identify areas such as watersheds or landscapes having the highest potential for improving ecosystem components through passive and active restoration .b. Are flexible with changing resource conditions and new information .c. Maintain areas having high ecological integrity d. Integrate aquatic, riparian, upland forest, shrub land and grassland components. e. Consider disturbance processes and patterns such as fire, insects, disease, wind throw and invasive species .f. Improve social and economic conditions .g. Contribute to recovery of listed species .h. Integrate State Total Maximum Daily Load (TMDL) programs .i. Facilitate collaboration with external partners.): Suggestion: In addition to sub-items a. through i., add: j. Work toward removal of streams from the Montana State Integrated Report, Clean Water Act, 1996 303(d) list, as soon as possible. 3. There was a discussion of the relative benefits of sampling macro invertebrates rather than sediment to monitor watershed health. (Place Based Groups, Stevensville, MT - #823)

Sample Statement:

The Flathead National Forest has within its boundaries several water quality limited stream-segment watersheds. These streams and rivers are listed by the Montana DEQ under the Clean Water Act in a process which occurred since the last forest plan. The forest planning process offers an excellent opportunity to incorporate standards that can fulfill the total maximum daily load contribution of the USFS in these streams. We would like to see such standards included in the next plan. (Preservation/Conservation, Missoula, MT - #157)

Sample Statement:

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Please establish legally enforceable management standards and monitoring requirements that will achieve on-the-ground conditions warranting the removal of all water bodies and species from impaired, threatened, and endangered status (Individual, Petaluma, CA - #418)

PC #: 154

Public Concern: The Forest Service should not favor economic exploitation and human activities over biological factors in ecosystem management. Ecological integrity must take precedence over any single species, including humans.

Sample Statement:

Under the banner of "ecosystem management," economic exploitation and other human activities are often front loaded into the planning processes while the biological factors that contribute to long-term viability for imperiled species are ignored. Management plans of this sort, which would allow complex and irreplaceable species interactions to disappear, could have profound effects on ecosystem health. Such management plans are scientifically unsound. (Preservation/Conservation, Boulder, CO - #137)

PC #: 164

Public Concern: The Forest Service should define Healthy Forest.

Sample Statement:

Does the FS have a definition of a "Healthy Forest?" Forest health is used by a lot of people and some people have a different idea of what a healthy forest is. (Place Based Groups, Missoula, MT - #826)

PC #: 152

Public Concern: The Forest Service should use viability and sustainability as underlying ecosystem management principles.

Sample Statement:

Action EM-F1-A1: (We propose to use sustainability and viability as the underlying ecosystem management principles. We propose to use these principles to provide for human needs and to conserve species for present and future generations.) Gotta agree with this one (Individual, No Address - #53)

Sample Statement:

Action EM-F1-A1 (We propose to use sustainability and viability as the underlying ecosystem management principles. We propose to use these principles to provide for human needs and to conserve species for present and future generations.) These definitions of sustainability and viability are good principles to go by. (Individual, Missoula, MT - #510)

Sample Statement:

The LWG strongly supports your proposed overall plan to use sustainability and viability as the underlying ecosystem management principles and to provide for human needs and conserve species for present and future generations. (Action EM-F1-A1) (Preservation/Conservation, Lolo, MT - #609)

Sample Statement:

Action EM-F1-A1: (We propose to use sustainability and viability as the underlying ecosystem management principles. We propose to use these principles to provide for human needs and to conserve species for present and future generations.) WE proposed to use sustainability and ecological integrity as the underlying ecosystem management principles. (Individual, Condon, MT - #312)

Subconcern:

THE FOREST SERVICE SHOULD PHASE OUT MINERAL EXTRACTION IN RIPARIAN AREAS.

Sample Statement:

Action EM-F1-A1(We propose to use sustainability and viability as the underlying ecosystem management principles. We propose to use these principles to provide for human needs and to conserve species for present and future generations.): We propose to use sustainability and viability as the (underlying ecosystem management principles. We propose to use these principles to provide for human needs, including economy, culture, custom, history and wildlife to help conserve species for present and future generations. (Place Based Groups, No Address - #822)

Subconcern:

THE FOREST SERVICE SHOULD EXPAND RIPARIAN BUFFERS.

Sample Statement:

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When talking about sustainability and viability we need to also discuss ecosystem integrity (defined in Highlighted Scientific Findings of the ICBEMP--"Ecological integrity describes the wholeness and resiliency of an ecological system. A system with integrity functions properly because it has all its parts and processes intact. Such a system rebounds faster after wildfires, floods, road building, and other disturbances. The ratings of high, moderate, and low are relative ratings within the basin. No absolute measures exist." Ecosystem integrity needs to be included in action EM-F1-A1 (We propose to use sustainability and viability as the underlying ecosystem management principles. We propose to use these principles to provide for human needs and to conserve species for present and future generations.)- There is a concern that Forest Service Scientists have a disconnect from the ground.- How will social, economic, and ecological sustainability be weighed - what "snapshot" in time will this be weighed at.- There is a concern that we can't get away with placing greater emphasis on social and economics for a period of time by putting in more energy (i.e. more intensive management).- We are past industrial forestry but not past forestry.- Ecological sustainability must override social and economic sustainability otherwise we will lose protection of the forest resources.- Ecological sustainability must look into the future (i.e. 7 generations).- Social sustainability is the ability to maintain social and economic capital.- Put on earth to maintain ecological integrity but it does not mean we can't manage the resources.- If logging, grazing, etc. is sustainable without damaging the system we will be able to sustain the social, economical, and ecological for future generations so we can still produce these goods in the future. (Place Based Groups, Stevensville, MT - #823)

PC #: 159

Public Concern: The Forest Service should have a plan to create healthy forests for the regional economy and people's enjoyment.

Sample Statement:

We are all witnesses to the continued increase in the number of fires, the severity of the fire behavior, and the negative impact on the over-all health of our forest system the past 20 years due to mismanagement of our resources. It is essential to the economy of the region to institute a workable management plan to remedy the past into a healthy forest to be enjoyed by all. (Individual, Kalispell, MT - #451)

Subconcern:

AREAS OF REGENERATION HARVESTS WITH SINGLE LANE DIRT ROADS DO NOT FRAGMENT A FOREST

Subconcern:

THE SOLUTION IS TO MAINTAIN KEY LINKAGE AREAS ACROSS PUBLIC AND PRIVATE LANDS AS WELL AS HIGHWAYS

Subconcern:

ONLY NATURAL PROCESSES AND EVENTS SHOULD BE PERMITTED IN LINKAGE ZONES

Subconcern:

LINKAGE ZONES SHOULD INCLUDE COLLABORATION WITH THE STATE, COUNTIES, AND TRIBES

PC #: 149

Public Concern: The Forest Service should not develop restoration strategies.

Sample Statement:

Action EM-F11-A1: (We propose that each forest develop restoration strategies that: a. Identify areas such as watersheds or landscapes having the highest potential for improving ecosystem components through passive and active restoration. b. Are flexible with changing resource conditions and new information. c. Maintain areas having high ecological integrity d. Integrate aquatic, riparian, upland forest, shrub land and grassland components. e. Consider disturbance processes and patterns such as fire, insects, disease, wind throw and invasive species. f. Improve social and economic conditions. g. Contribute to recovery of listed species. h. Integrate State Total Maximum Daily Load (TMDL) programs. i. Facilitate collaboration with external partners.)NO (Individual, Hamilton, MT - #233)

PC #: 156

Public Concern: The Forest Service should not consider wilderness and roadless areas as having high forest integrity.

Sample Statement:

The "Project" describes the national forests as having varying degrees of "fragmentation" and "integrity", and indicates that much of project area has low forest integrity. The several national forests on which I have worked over the last 42 years are mostly of moderate to high integrity where management practices other than fire suppression, have taken place. However, some areas where there has been no management other than fire suppression, have heavy fuel loads and dense timber of all

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sizes resulting in weakened trees, insect and disease problems and ladder fuels as well as a heavy fuel load build up. Road construction did not cause this unhealthy condition! Lack of management caused it, and it has occurred within the Wilderness and other non-roaded areas! Yet the "Project" indicates these areas have high forest "integrity" while roaded areas have low forest "integrity". This assumption cannot be based on investigation or observation. It is invalid, and is NOT "science"! (Individual, Paradise, MT - #158)

PC #: 158

Public Concern: The Forest Service should not fall into the trap of single objective management when addressing fuels management.

Sample Statement:

Do not fall into the trap of single objective management with fuels management. A more integrated landscape wide approach to land management can meet multiple objectives rather than promoting user conflicts that would occur in single objective management. Vegetation management within the urban interface needs to focus on providing a generally healthy forest structure. This will provide multiple benefits, including reduced wildfire risk, improved wildlife habitat, and increased recreational opportunities. Review some of the research completed by Keegan et. al. regarding the economic and effectiveness benefits of comprehensive long term stand treatment, compared to traditional short term understory fuels treatment. (Timber or Wood Products Industry, Columbia Falls, MT - #437)

Subconcern:

THE FOREST SERVICE SHOULD ALSO PROVIDE GREEN TREE REPLACEMENTS.

Subconcern:

THE FOREST SERVICE SHOULD CONSIDER THAT AFTER FIRES THERE MAY BE TOO MANY SNAGS.

Subconcern:

THE FOREST SERVICE SHOULD MANAGE FOR MORE OLD GROWTH AND PROVIDE SNAGS AT THE HIGHER END OF VARIABILITY IN PONDEROSA PINE HABITAT TYPES.

Subconcern:

THE FOREST SERVICE SHOULD RECOGNIZE THAT THE REAL PUBLIC ISSUE IS UNNATURAL EXTREME FIRE HAZARD.

PC #: 155

Public Concern: The Forest Service should not use the term ecosystem management, as it includes state and private lands.

Sample Statement:

I am adamantly opposed to the term "ecosystem management." The ecosystem includes state and private lands. We are supposed to be writing a plan for the National Forest. (Individual, Polebridge, MT - #656)

Section: Physical Elements, General

PC #: 166

Public Concern: The Forest Service should include soils and water quality standards in post-fire areas.

Sample Statement:

The RFPs must include soils and water quality standard for post-fire areas, because of the scientific and public controversies and the known elevated risks of logging such areas. (Preservation/Conservation, Missoula, MT - #521)

PC #: 165

Public Concern: The Forest Service should base planning and management on historic range of variability.

Sample Statement:

A fundamental lesson from the failures of piecemeal resource management is that ecosystems remain healthy only when

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their processes remain intact.....but they vary within certain bounds. This bounded variation is often called the "historic" or "natural" range of variability. When this range of variability is exceeded in either direction...then certain species will decline, sometimes to extinction. (Preservation/Conservation, Boulder, CO - #137)

Sample Statement:

Quantity and type of vegetation on the National Forest watershed have a major impact on quantity, quality and timing of water yield. Restoring historic range of variability of vegetation, which will include the reestablishment of the grassland understory, could provide optimum stream flow and water quality. (Preservation/Conservation, Hamilton, MT - #957)

PC #: 167

Public Concern: The Forest Service needs to inventory, monitor, and protect soils.

Sample Statement:

Monitoring of detrimental soil disturbances needs to include: compaction, displacement, rutting, severe burning, erosion, loss of surface organic matter (especially coarse woody debris), soil mass movement, soil temperature, and damage to micro-biological components of soil (especially mycorrhizal fungi). (Preservation/Conservation, Helena, MT - #341)

Sample Statement:

The RFP must define, monitor, and measure soil productivity, instead opting for a limit on a real extent of cumulative soil compaction, displacement, detrimental burning, and other damage without confirmation of its appropriateness as a proxy for insuring soil productivity. Cumulative soil damage in any given watershed must be dealt with in the RFPs. (Preservation/Conservation, Missoula, MT - #521)

Sample Statement:

Soil conditions are the elephant in the living room on the Bitterroot National Forest that we are not supposed to notice while having our attention diverted by the 6 "significant needs for change" selected in-house by the Forest Service. Soil conditions on the BNF are in great disrepair and are, for all practical purposes, un-reclaimable and nearly permanent on a human time scale. That is why this issue is not included. Responsible management of soils would exclude most of the logging done recently after the fires. By continuing recent failures to adequately monitor and manage soil conditions the Bitterroot NF is setting itself up to become exhibit A on a forest wide NFMA lawsuit. Leaving soils management out of Forest Plan Revision public discussions is only feeding this problem. (Individual, Darby, MT - #582)

PC #: 168

Public Concern: The Forest Service should not include sound level as a reason to justify motorized recreation and access closures.

Sample Statement:

A study of sound levels from OHV use was found to be less than the background noise of the wind in treetops (Nora Hamilton, Mendocino National Forest, memorandum to the file, November 17, 1992). Also, the USDA FS Technology and Development Program in a report prepared in 1993 and titled "Sound Levels of Five Motorcycles Traveling Over Forest Trails" found that at distances over 400 feet, motorcycles do not raise the ambient sound level (they are no louder than background levels of noise). Absolute quiet is not a reasonable expectation. Sound from motorized sources such as airplanes exists even in the most remote areas. It is not reasonable to expect absolute quiet in areas intended for multiple-use. The sound level of motorized recreation use is not greater than natural sounds, and therefore, sound level should not be used as a reason to justify motorized recreation and access closures. (Recreational, Helena, MT - #339)

Sample Statement:

It is not reasonable to enact motorized closures based on the issue of sound when viable alternatives could be pursued. The Sierra Club's in their ORV Handbook makes the following statement "The fact is that most ORV noise is unnecessary; even motorcycles can be muffled to relatively unobjectionable noise level". We request that agencies initiate an education campaign (loud is not cool) to promote the development and use of quiet machines. OHV brochures such as those published by the Wallowa-Whitman National Forest include public awareness information on the importance of sound control. (Recreational, Helena, MT - #339)

PC #: 169

Public Concern: The Forest Service should maintain a well-developed road system for good visitor access and hunter distribution.

Sample Statement:

Action EM-F7-A1: (We propose to develop access management goals, objectives, and standards that would better address the needs of big game and other wildlife species, aquatic species, water quality, and invasive species. This direction would mainly focus on reducing the miles of road.)We agree with the fisheries and water quality management goals, objectives, and standards. Access management needs may be significant in some areas where human population has increased to the

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point where recreational driving is heavy (near Missoula, Kalispell, Hamilton) but over most of the WMPZ, population density is much lower as are forest recreation visitors and road traffic. A well-developed road system will provide good visitor and hunter distribution, which will result in greater visitor satisfaction and good distribution of game harvest during the hunting seasons. (Place Based Groups, Paradise, MT - #258)

PC #: 170

Public Concern: The Forest Service should protect and improve watershed function as a key element of ecosystem management.

Sample Statement:

We also recommend that the forests clearly state that protection and improvement of watershed function is a key element of ecosystem management. The forests still view ecosystem management too narrowly by focusing mainly on the "health" of vegetative resources. The forests should take a more watershed-centric view of ecosystems. When water is clean, channels functioning naturally, erosion and deposition in dynamic equilibrium, woody debris recruitment occurring at an expected natural rate, annual and peak water yield within a natural range, aquatic system connectivity unimpaired and aquatic communities healthy, it often means the larger ecosystem is healthy. (Preservation/Conservation, Missoula, MT - #488)

Sample Statement:

The RFPs must include objective, quantitative standards for sediment, stream shading, stream channel stability, stream bank stability, water temperature, water yield, cobble embeddedness, pool frequency and depth, and other objective measures of chemical and physical aquatic habitat integrity. (Preservation/Conservation, Missoula, MT - #521)

Sample Statement:

Watershed management practices are important and should control vegetation that decreases or impairs long-term water quality or quantity to avoid jeopardy to State(s) water rights. (Individual, Roosevelt, UT - #33)

Sample Statement:

An ecologically sound Aquatic Conservation Strategy is necessary to establish broad scale goals and standards to ensure that the level of planning is commensurate with the high degree of sensitivity of aquatic resources to human disturbance. The four major components of an Aquatic Conservation Strategy are: 1. Aquatic/Riparian Conservation Areas: portions of areas along streams and unstable areas where riparian-dependent resources receive primary emphasis and special standards and guidelines govern land use; 2. Aquatic Strongholds: a system of large refugia comprising watersheds that are crucial to at-risk aquatic species and for high quality water; 3. Watershed Analysis: procedures for conducting analysis that evaluate geomorphic and ecologic processes operating within specific watersheds. Watershed analysis provides the basis for monitoring and restoration programs. Monitoring encompasses the gathering of data at multiple scales both temporally (short, intermediate, and long term) and geographically (stream reach, sub-basin, catchment basin, and range-wide) for evaluation of implementation and effectiveness of the ACS; and 4. Watershed Restoration: a comprehensive, long-term program aimed at the restoration of watershed functions (including sediment regimes), riparian ecosystems, and aquatic species' habitats. The removal of roads from riparian areas, unstable areas, and aquatic strongholds should be a restoration priority. These components are designed to operate together to maintain and restore the productivity and resilience of riparian, aquatic, and watershed ecosystems. "NOTE - Detail description of an ACS is provided in the original paper" (Preservation/Conservation, Bozeman, MT - #706)

PC #: 171

Public Concern: The Forest Service should protect and restore all wetlands.

Sample Statement:

Wetlands, protecting and enhancing all forms of wetlands. They are important and we can not afford to lose any more. (Individual, Superior, MT - #734)

PC #: 172

Public Concern: The Forest Service should have a timber sale program that effectively harvests the sustained yield of the land.

Sample Statement:

We need an active timber sale program that effectively harvests the sustained yield of the land. Another objection to this proposed program is that it will increase runoff and sedimentation of the streams. My argument against this charge is that it will be minimal if all road building and forest activities are done by using the best management practices. The fires of 2003 on the Flathead Forest will create many times the sediment that would have been created by logging the same area. (Individual, Kalispell, MT - #506)

Section: Biological Elements Management

PC #: 174

Public Concern: The Forest Service should manage food attractants wisely to prevent conflicts with bears or other carnivores.

Sample Statement:

Human-caused mortality can be reduced with careful management of our activities in a few areas (Predator Conservation Alliance 2002). First, wise management of livestock, pets, food, garbage, game and other attractants at our homes and in the backcountry can prevent conflict between human and bears or other carnivores. (Individual, Missoula, MT - #718)

PC #: 175

Public Concern: The Forest Service should update MIS to better reflect the effects of management.

Sample Statement:

Action EM-F8-A1: (We propose to update our management indicator species to better reflect the effects of management activities and to promote consistency where appropriate.) Discussion was about the intent of the action. The action was approved as written. (Place Based Groups, No Address - #825)

PC #: 173

Public Concern: The Forest Service should manage for the production of water and timber while providing for all the recognized multiple uses rather than use sustainability and viability as underlying ecosystem management principles.

Sample Statement:

Congress has provided the Forest Service with its' mission found within the OA and MUSYA - basically, to without impairment of the long-term productivity of the land as MUSYA requires. The Plan proposes 'to use "sustainability and "viability": as underlying ecosystem management principles.* To do so places 'sustainability' and "viability" of the ecosystem as the purpose of* the National Forests! Rather, the OA establishes the purpose of establishment and administration of our national forests as stated above. (Individual, Paradise, MT - #511)

PC #: 176

Public Concern: The Forest Service should map and analyze stand-replacement fire regimes according to habitat type, not cover type.

Sample Statement:

Many areas in the northern Rockies are in stand-replacement fire regimes. Please map and analyze these areas according to habitat type; not cover type, in the EIS. Inappropriate decisions are being made when habitat type is either deliberately ignored or simply overlooked. Proper identification and mapping of habitat type should appear in the EIS and in every project level analysis after the ROD is signed, no exceptions. (Business, Missoula, MT - #616)

PC #: 177

Public Concern: The Forest Service should recognize the value of large snags and woody debris.

Sample Statement:

Action EM-F4-A1 should recognize the value of large snags and woody debris. It is invalid to lump all 'fuel loading' from 3" diameter to + 30" diameter together, as is now done. The fire behavior and biological values are worlds apart and those distinctions need to be recognized.[Action EM-F4-A1: (We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.)] (Individual, Darby, MT - #582)

Sample Statement:

EM-F4: There are many needs for snag retention other than vertical structure. These include wildlife, development of old growth an. long term soil fertility. (Individual, Columbia Falls, MT - #534)

PC #: 181

Public Concern: The Forest Service should reduce the miles of roads particularly in wildlife corridors and near wilderness, wilderness study and roadless lands.

Sample Statement:

Action EM-F7-A1 (We propose to develop access management goals, objectives, and standards that would better address the needs of big game and other wildlife species, aquatic species, water quality, and invasive species. This direction would mainly focus on reducing the miles of road.)Add: ... on reducing the miles of road particularly in wildlife corridors and closure of roads near wilderness, wilderness study and roadless lands. (Individual, Condon, MT - #638)

PC #: 180

Public Concern: The Forest Service should protect all old growth stands.

Sample Statement:

I urge you to protect the remaining stands of old growth. (Individual, Swan Valley, MT - #476)

Sample Statement:

(CONT'D)of old-growth habitat (Baker and Knight 2000). In general larger stands are more effective as habitat than smaller stands. (Pfister 2000) Fragmentation, of existing patches of old growth by roads, timber harvesting or other created openings will decrease effectiveness of the patch as habitat due to the reduction in amount of interior old-growth conditions (Baker and Knight 2000). In general non-fragmented stands are more effective as habitat than smaller stands. (Pfister 2000) Stands that met the Green et al definition of old growth but are burned in a forest fire do not cease to provide a valuable function to wildlife and the forest ecosystem and should not be salvage logged. This burned old growth may function differently but it is still important habitat because burned snags stand much longer than beetle-killed trees, and the fact that it burned does not change its age and age is a primary factor in old growth habitat. (Pers. comm. R. McClelland)
RECOMMENDATIONS o Use the Old-Growth Forest Types of the Northern Region as a guide to delineating old growth o stands. o All existing old growth must be preserved. The Forest Service must calculate how much old growth there is now on a watershed (i.e., approximately 10,000 acres) and forest-wide basis. Then designate recruitment old growth in an amount at least double the current amount of existing old growth to achieve at least 33% old growth/recruitment old growth in each watershed. Recruitment old growth must be allowed to progress towards the old growth conditions described above. (Individual, No Address - #824)

Sample Statement:

[CONT'D]Recruitment old growth is subject to the same protections as designated current old growth .o Designate the existing oldgrowth and future old growth and place them on maps. (Pfister 2000) Connect these stands with linkages as described above. o Place longer-rotation or less intensive uses adjacent to designated old growth, so that a lower intensity managed zone serves as a buffer for the old-growth system (Noss and Cooperrider 1994). Avoid placing high intensity land uses (e.g. clearcuts, roads) next to designated old growth. (Pfister 2000)o Don't worry about the appropriate mix of stand structures and compositions within old growth, because the science has not yet provided that kind of resolution (Pfister 2000) o Big old growth reserves are better than small ones, unfragmented reserves are better than fragmented, reserves closer together are better than reserves far apart, reserves connected to others are better than those not connected. (Pfister 2000) o Integrate future recruitment old growth into the network. Where otherwise equivalent replacement stands exist, choose those adjacent to designated old growth as future old growth .o No logging should take place in old growth stands. Under limited and extraordinary circumstances some thinning of sapling and pole-sized timber less than 6 inches in diameter may be appropriate but only in ponderosa pine habitat type, without using heavy equipment, and when there are no adverse effects to old-growth dependent, management indicator, sensitive, threatened or endangered species. (Individual, No Address - #824)

Sample Statement:

[CONT'D]o No salvage logging should take place in old-growth even if the stands burn in a forest fire.LITERATURE CITED Green, P., J. Joy, D. Sirucek, W. Hann, A. Zack, and B. Naumann. 1992. Old-Growth Forest Types of the Northern Region. USDA Forest Service, Northern Region R-1 SES 4/92. 60 p.Thomas,J.W., E.D. Forsman, J.B. Lint, E.C. Meslow, B.R.Noon, and J.Verner. 1990. A conservation strategy for the northern spotted owl: A report of the Interagency Scientific Committee to address the conservation of the northern spotted owl. U.S. Department of Agriculture, Forest Service; U.S. Department of the Interior, Bureau of Land Management, Fish and Wildlife Service, and National Park Service. Portland, Oregon. 523 pp.Bennett, A.F. 1999. Linkages in the landscape: The role of corridors and connectivity in wildlife conservation. IUCN, Gland, Switzerland. 254 pp.Pfister, R.D., W.L. Baker, C.E. Fiedler, J.W. Thomas. 2000. Contract review of old-growth management on school trust lands: Supplemental Biodiversity Guidance 8/02/00. 30 p.Baker, W.L., and R.L. Knight 2000. Roads and forest fragmentation in the southern Rocky Mountains. Pages 92-122 In Knight, R.L., F.W. Smith,S.W. buskirk, W.H. Romme and W.L. Baker editors. Forest fragmentation in the Southern Rocky Mountains. University Press of Colorado, Boulder.Noss, R.F. and A.Y. Cooperrider. 1994. Saving nature legacy: Protecting and restoring biodiversity. Island Press, Washington, D.C. (Individual, No Address - #824)

PC #: 179

Public Concern: The Forest Service should not establish linkage zones.

Sample Statement:

EM-F5-AI(We propose to identify linkage zones at the landscape scale to facilitate species movement and genetic exchange.) The concept of linkage zones escapes me! It is my understanding the wildlife will move where they want. Establishing designated linkage zones assuming that the wildlife will use these areas seems crazy! If you manage lands generally with the goal of preserving habitat values, the wildlife will establish linkage zones. I strongly disagree with acquisition of additional federal lands to establish linkage zones. It is clear that the agency is not able to manage the acres they have, and the federal government should not be taking additional acres out of private ownership. (Individual, Trego, MT - #213)

Sample Statement:

Using the concept of landscape connectivity to provide linkage zones for certain species is unacceptable This is the same language contained in the lynx conservation strategy that we also oppose The linkage referred to in that document would halt virtually any activities on all nine of the national forests in Montana and certainly the three addressed in the Proposed Action. While the protection and recovery of certain species is important, that protection must be balanced with the humans and their livelihoods in the same area (Timber or Wood Products Industry, Helena, MT - #334)

Sample Statement:

There is no documentation or data to support closure of any motorized routes in the project area to improve wildlife connectivity. The existing level of roads and trails does not significantly impact wildlife connectivity, i.e. it functions as such with the existing level of roads and trails and closing any roads or trails to motorized use would not make any measurable difference. Connectivity is another concept being promoted by extreme green groups such as the Wildlands Project to further their agenda to close all land to the public. Additionally, non-motorized routes would have the same impact on wildlife connectivity as motorized routes and the evaluation must recognize this fact. (Recreational, Helena, MT - #339)

Sample Statement:

Most of Montana is relatively unfragmented compared to other areas of the country where this is a critical issue. Large, undisturbed, set-asides for "linkage" has many more conflicts than other proven means of ensuring genetic diversity. Large, additional linkage set-asides may or may not be beneficial in providing population improvements for the wide diversity of threatened, endangered, sensitive and management indicator species of flora and fauna in the proposed action area. Furthermore, substantial research efforts are ongoing which will provide a sound basis for informed decisions on this subject. (Preservation/Conservation, Missoula, MT - #624)

PC #: 560

Public Concern: The FS should use a science-based approach to protect and recover threatened, endangered, and sensitive species.

Sample Statement:

Action EM-F2-A2: (We propose to use values and ecosystems at risk as primary considerations when managing to reduce the hazard of large-scale insect and disease infestations and severe wildland fires. Examples of values and ecosystems at risk include but are not limited to such things as public and firefighter safety, homes, communication sites, municipal watersheds, and threatened, endangered, sensitive species habitat.) I would like to see this action worded with more specificity, including listing the particular species at risk that will be considered in management plans, yet leaving room for additional species as the need arises. While I realize the purpose of the Proposed Action is not to become specific about management actions, for the record I would like to state my concerns regarding management for species at risk. I am particularly concerned about management for listed species, such as lynx and grizzlies. Given present conditions and trends, managers need to put into practice the most current goals for viable populations for all native species, with the caveat that a species approach to conservation cannot alone protect biodiversity across the breadth of the forest. (Individual, Bigfork, MT - #475)

Sample Statement:

Forest Plans should give full support to scientifically-based approaches regarding these species. Support sufficient research to identify T&E species, and support the long term survival and health of these species over any short term economic gain. (Individual, Hamilton, MT - #760)

Sample Statement:

Forest Plans should give full support to scientifically-based approaches regarding these species. Support sufficient research to identify T&E species, and support the long term survival and health of these species over any short term economic gain. (Individual, Hamilton, MT - #551)

PC #: 535

Public Concern: The Forest Service should focus maintenance and improvement of habitat connectivity and biodiversity at large scales through the establishment of linkage zones within and adjacent to the planning areas.

Sample Statement:

Action EM-F5-A1: (We propose to identify linkage zones at the landscape scale to facilitate species movement and genetic exchange.) As general principles I support finding EM-F5 and Action EM-A1. Three forests, the Flathead, Lolo, and Bitterroot National Forests are particularly important to the conservation of large carnivores and threatened and endangered species. Western Montana is critical to the survival of the Grizzly Bear. Maintaining and improving connectivity should be important planning goals for Forest Plan Revision in the three connecting forests above. The USFS should set clear objectives, based on scientific data, to meet the goal of maintaining and improving connectivity. Planning is needed on the landscape level for long-term protection of wildlife and their habitat. Finding EM-F5 and Action EM-A1 begin this cooperative process of conserving biodiversity in three connecting forests and adjoining forests. Connected, non-fragmented habitats in these forests are important to me because 1)I have lived in Western Montana off and on -- and every summer -- for 55 years. Old-growth at low and mid elevations has mostly disappeared. "Sweetening the pot" continues to remove the rest, which is far and away not the best. Roadless lands shrink. Nature is not allowed to make more old-growth and roadless lands and their time may be gone forever. Where will disappearing wildlife live and predators roam? Every acre of roadless land must remain so and roads removed to connect more. (Individual, Corvallis, MT - #950)

Sample Statement:

Landscape level planning is necessary for the long-term protection of wildlife and wildlife habitat. In the recent Action Plan, Finding EM-F5 and the subsequent Action EM-A1(We propose to identify linkage zones at the landscape scale to facilitate species movement and genetic exchange.) are substantial steps toward comprehensive, landscape level plan necessary to conserve biodiversity in the three forests as well as throughout the Northern Rockies. (Individual, Hamilton, MT - #551)

Sample Statement:

RFP Standards must include limits on habitat fragmentation and requirements to maintain or restore habitat connectivity where significantly degraded by past management activities. (Preservation/Conservation, Missoula, MT - #521)

PC #: 178

Public Concern: The Forest Service should establish and manage linkage zones to facilitate species movement.

Sample Statement:

Action EM-F5-A1: (We propose to identify linkage zones at the landscape scale to facilitate species movement and genetic exchange.) Finding EM-F5: Landscape connectivity. This is a vital and new component of NF management and should not be limited to a theoretical or modeled minimum. The FS should establish linkage zones throughout the various forests and coordinate linkage zones with adjacent non-WMPZ forests. Action EM-F5-A1: We propose, as an example, a linkage zone between the Whitefish Range and the Yaak/Cabinet Mountains. See Attachment A, Linking the Kootenai and Flathead National Forests, by Troy Merrill. (Preservation/Conservation, Kalispell, MT - #256)

Sample Statement:

Action EM-F5-A1: (We propose to identify linkage zones at the landscape scale to facilitate species movement and genetic exchange.)It is important to ensure that wildlife have linkage zones so isolated populations do not become an issue. Implementing more conservation easements, land exchanges, etc. are good methods in trying to create connected linkage zones for wildlife, not to mention security. Often recovering species often cannot re-establish themselves, just because they don't have the proper migration routes & rights-of-way. (Individual, Missoula, MT - #273)

Sample Statement:

Science also tells us that wildlife populations cannot survive for long on isolated islands of habitat. Populations eventually become genetically weakened and suffer from inbreeding effects. The Citizen reVision addresses this problem through its identification of biological linkage corridors of habitat that link the core wildlands of the region into one functioning ecological whole. (Preservation/Conservation, Helena, MT - #341)

Sample Statement:

Finding EM-F5: (Disturbances, management activities, and development have fragmented and altered habitat, creating barriers to wildlife movement. Landscape connectivity allows animals to repopulate areas that have suffered local declines and minimize the negative effects of inbreeding. The grizzly bear recovery plan and lynx conservation strategy both call for evaluation of potential linkage zones.)Include "maintaining connectivity at all scales not just landscape scale." (Place Based Groups, Condon, MT - #349)

Sample Statement:

5) Maintain a corridor core of HQ habitat approximately 5 km in width, with a 5 km buffer zone of MQ and/or low quality (LQ)

habitat on either side of the core. Both the core and the buffer zone constitute the corridor. Within the core and buffer zone, human activities with known adverse effects on important wildlife species should be minimized. Such activities include ORVs, road building, commercial timber harvesting, mining, and oil and gas field development. a) no single square mile section in this corridor should exceed the 1 mi./square mi. standard for grizzly bear security. b) the core habitat should

approach the 0.75 mi./square mi. standard for elk security habitat. New roadbuilding should be excluded and existing roads should be removed to conform to these standards. c) minimize motorized use of any remaining roads within the corridor. d) off-road motorized vehicle use should be prohibited within the corridor. e) closures of existing roads and trails to all uses should be a management option seasonally or in localized areas if there is known use of an area by TE&S species. 6) No segment of the corridor core should be less than 1 km wide (500 m to either side of the centerline; a minimum distance for adverse effects upon grizzly bears (Mace and Manley 1993). 7) Minimize livestock allotment, especially in seasonally important habitats when carnivores may be present. (Preservation/Conservation, Bozeman, MT - #706)

PC #: 182

Public Concern: The Forest Service should evaluate all of the wild and scenic river proposals by Alliance for the Wild Rockies, the Ecology Center, Friends of the Wild Swan and other groups.

Sample Statement:

Please carefully evaluate all of the wild and scenic river proposals by Alliance for the Wild Rockies, the Ecology Center, Friends of the Wild Swan and other groups. Please recommend all eligible segments for W&S river status. Please establish the habitat linkage corridors recommended by Alliance for the Wild Rockies, Alliance for the Wild Rockies, the Ecology Center, Friends of the Wild Swan, and establish strong protective measures within them. (Individual, Roanoke, VA - #796)

Section: Fish, Wildlife, and Plants General

PC #: 551

Public Concern: The FS should protect and restore wildlife (and their habitats) for a variety of reasons including scientific study, moral and ethical obligations, aesthetics, hunting, and fishing.

Sample Statement:

According to the National Forest Management Act, the USFS must "maintain viable populations of native species in the planning area." We strongly value the protection of viable populations of wildlife in the Bitterroot, Lolo and Flathead National Forests for scientific study, moral and ethical commitments, and aesthetic reasons. We recreate in these forests, as well as enjoy the clean air and water regulated by the ecological systems preserved by wildlands. (Preservation/Conservation, Missoula, MT - #719)

Sample Statement:

Please reconsider any actions now that could change the emphasis for future decisions to be escalated against good wildlife management, serenity and solitude in the forest. Once you go down that road(sanctioned ATV usage increases)it can ONLY lead to more and more decisions against wildlife and nature. (Individual, Martin City, MT - #766)

PC #: 581

Public Concern: The FS should use local knowledge when choosing MIS for the forest plans.

Sample Statement:

Action EM-F8-A1: (We propose to update our management indicator species to better reflect the effects of management activities and to promote consistency where appropriate.)Include local knowledge when picking indicator species. Overhaul the whole indicator species concept and define it. See if monitoring for healthy ecosystems can do away with indicator species as a monitoring tool. (Place Based Groups, Condon, MT - #349)

PC #: 566

Public Concern: The FS should modify INFISH to provide more management flexibility in RHCAs and to address fire risk.

Sample Statement:

Allow more site specific management of riparian areas than dictated by INFISH and PACFISH. (Place Based Groups,

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Stevensville, MT - #823)

Sample Statement:

Action EM-F9-A1: (We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns. We also propose to emphasize management of habitat for species important for hunting or viewing.) Also on National forest lands on the Swan Valley there is little or no management at all in the broad riparian areas of major streams and associated lowlands. These places need professional attention and help. (Individual, Condon, MT - #312)

Sample Statement:

Study Areas in a "passive management" approach that effectively is a hands off policy. In December, 2003, the Healthy Forest Restoration Act was passed by Congress and signed into law by the President. It is Law. Within the Act, there is a specific expectation of and analysis of "Balance of Harms" to be done by the agency in regards to T & E species. Nowhere in the various subsections of the analysis of the current management, findings or proposed revisions do I see ANY emphasis or acknowledgement of the concept of "Balance of Harms." Blind continuation of usage of "Infish Stream Buffers" for riparian areas on areas otherwise categorized as "suitable for timber management" fail to take into account future fire risks in the SMZs as experienced in the fires of 2000. The revisions fail to consider potential impacts of T & E species at risk to continuing mega fires such as those of the Bitterroot in 2000 in the "primitive" back country that is limited to only foot or horseback access in the fire seasons. Finally, the presumptions of the agency and select members of the public pertaining to "visual retention" management areas appear to me to propagate elevated fire risks that constitute a severe and real future risk to T & E species. (Business, Hamilton, MT - #239)

PC #: 567

Public Concern: The FS should validate the science that supports PACFISH and INFISH.

Sample Statement:

Action EM-F10-A1: (We propose to adopt the majority of the interim management direction contained in INFISH and PACFISH, with minor modifications to Riparian Management Objectives. In addition, we propose to make minor modifications to standards and guidelines to better fit local conditions and capabilities within RHCA's.) INFISH and PACFISH need to be looked at again to see if the scientific information was not biased or lopsided for more regulation and elimination of public land from the tax base. (Individual, Kalispell, MT - #781)

PC #: 568

Public Concern: The FS should establish numeric sediment standards designed to protect aquatic species, particularly bull trout.

Sample Statement:

The Forest Plan revision must strengthen the standards contained in the Inland Native Fish Strategy (INFISH) and include a standard for sediment, since INFISH did not contain one. Forest Plans must include standards that recover this native fish species, not merely maintain the status quo. (Preservation/Conservation, Big Fork, MT - #708)

Sample Statement:

The current Forest Plans' Inland Native Fish Strategy (INFISH) Amendment failed to adopt specific, numeric standards at optimum levels for bull trout, which can have dramatic effects on bull trout reproductive success and recruitment. The failure to protect upwelling groundwater is also a serious deficiency in current Forest Plans. (Preservation/Conservation, Helena, MT - #341)

Sample Statement:

The Forest Plan revision and EIS must strengthen the standards contained in the Inland Native Fish Strategy (INFISH) and include a standard for sediment since INFISH did not contain one. Since INFISH was adopted the bull trout has been listed as a threatened species throughout its range in five states. INFISH is an "inadequate regulatory mechanism," for bull trout recovery, one of the factors which triggered its listing. Forest Plans must include bull trout standards that recover this native fish species, not merely maintain the status quo. (Business, Missoula, MT - #616)

PC #: 570

Public Concern: The FS should provide for passage of aquatic species and amphibians through culverts.

Sample Statement:

Finding EM-F7. We recommend changing item 3 ("Many culverts are barriers to fish passage") to include more than fish, since recent evidence suggests that culverts block the movement of amphibians and other aquatic organisms, as well as

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fish. (State Agency or Official, Missoula, MT - #697)

PC #: 571

Public Concern: The FS should develop food storage guidance for backpackers.

Sample Statement:

Action EM-F6-A1: (We propose to develop consistent guidance on the three forests to eliminate or minimize human-caused food sources for bears.) I support consistent guidance re bear food sources, but also urge development of convenient lightweight food storage methods for backpackers. (Individual, No Address - #53)

PC #: 573

Public Concern: The FS should close winter range to over snow use.

Sample Statement:

There was agreement that winter game ranges should be closed to over snow use. (Place Based Groups, Stevensville, MT - #823)

PC #: 574

Public Concern: The FS should develop an alternative that integrates road management, watershed restoration, and the habitat needs of grizzly bears, bull trout and all other fish and wildlife species.

Sample Statement:

I would like to see a formal alternative in the DEIS that incorporates the following: Develop an integrated road management and reclamation program that restores all watersheds so they provide adequate and permanent security habitat for grizzly bear, bull trout, and all other fish and wildlife species. (Business, Bigfork, MT - #252)

PC #: 587

Public Concern: The FS should consider different MIS for each forest.

Sample Statement:

It seems likely that the indicator species (EM-F8) do not function equally well as indicators on all three forests. This is surely an area where differences between the forests are advisable. (Recreational, Columbia Falls, MT - #589)

PC #: 563

Public Concern: The FS should analyze the effects of fish stocking on invertebrates, amphibians, and other aquatic species.

Sample Statement:

A forest-wide analysis of the effects of fish stocking on amphibian, invertebrates, and other aquatic species should be completed and a management plan formulated that places highest priority on restoration of native species. An interdisciplinary team should be formed to design a network of refugia for amphibians and aquatic invertebrates within historic fishless areas. Removal of introduced fish from designated refugia should be conducted in the least ecologically damaging manner possible according to a restoration plan developed with the assistance of the interdisciplinary team, and under no circumstances should rotenone or other toxic substances be used to eradicate introduced fish. Impacts to sport fisheries should be balanced against the need to recover native fish and non-fish species. (Preservation/Conservation, Bozeman, MT - #706)

PC #: 585

Public Concern: MIS should be consistent on all three forests.

Sample Statement:

It is readily apparent the list of Management Indicator Species should be made consistent across the three Forests - by a cumulative process, not one of least common denominator. (Preservation/Conservation, Kalispell, MT - #544)

Sample Statement:

Management Indicator Species (MIS) must be treated with consistency across these three forests, and should truly be representative of the species that will serve as surrogates for other impacted species. MIS should be reasonably easy to monitor - no excuses this time. For example, the Flathead's choice of MIS for old-growth forests in Amendment #21 does not adequately represent the needs of closed-canopy old-growth species and by virtue of being on the sensitive species list are

already scarce and therefore not easily monitored. (Business, Missoula, MT - #616)

PC #: 555

Public Concern: The FS should develop management direction for shrub communities, given their importance as wildlife habitat.

Sample Statement:

In general we feel that the shrub component is being lost on Montana's forested lands. Shrubs are the mainstay of ungulates and many other species. The anecdotal evidence is overpowering and empirical evidence is increasing. FWP would not be able to manage for elk and deer in western Montana without a healthy shrub component. It is the primary component of the winter diet for these species. We ask that the new forest plans incorporate the flexibility to address special needs of wildlife when designing forest management actions. (State Agency or Official, Missoula, MT - #697)

PC #: 582

Public Concern: The FS should consider monitoring ecosystems as opposed to MIS.

Sample Statement:

Action EM-F8-A1: (We propose to update our management indicator species to better reflect the effects of management activities and to promote consistency where appropriate.) Include local knowledge when picking indicator species. Overhaul the whole indicator species concept and define it. See if monitoring for healthy ecosystems can do away with indicator species as a monitoring tool. (Place Based Groups, Condon, MT - #349)

PC #: 184

Public Concern: The Forest Service should recognize that the zone is uniquely suited to supporting one of the only remaining populations of large predators in the lower 48 states and should put more emphasis on managing the land for these species.

Sample Statement:

Based on my information re: current Forest Plan Revisions for the Bitterroot, Flathead, and Lob National Forests I think the management emphasis is skewed. I realize you are required by law (MUSY, NFMA, and local Forest Reg.'s) to look at all uses across the landscape. However, what I feel you fail to consider in these revisions is that the three forests mentioned above are uniquely suited (due to size, topography, climate, etc.) to supporting one of the ONLY remaining populations of large predators in the lower 48 states. Based on this fact alone (and the legal obligation under the ESA), I believe you need to put more emphasis on managing the land for these wildlife species. As you also are well aware, you are obligated by law to use the best available science to inform these decisions (Individual, Moscow, ID - #784)

PC #: 575

Public Concern: The FS should consider the impacts of salvage logging on birds and their habitats.

Sample Statement:

Action FP-F3-A1 (We propose to encourage salvage logging following fire, insect and disease outbreaks, or other forest disturbance when compatible with management area goals). There are many species that depend on burned areas--black-backed woodpeckers are a good example. These birds are limited to burned areas. Salvage logging, even if a few snags are left, greatly disturbs or eliminates this habitat. Unless the management area designations protect a substantial amount of burned areas from salvage logging, or if some of the species dependent on burns are listed as indicator species, this action is not acceptable as it is. (Individual, Missoula, MT - #510)

PC #: 565

Public Concern: The FS should not weaken standards (in INFISH) that would increase risk to watersheds and native fish. Any modifications to INFISH should favor native species.

Sample Statement:

Action EM-F10-A1: (We propose to adopt the majority of the interim management direction contained in INFISH and

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PACFISH, with minor modifications to Riparian Management Objectives. In addition, we propose to make minor modifications to standards and guidelines to better fit local conditions and capabilities within RHCAs.) I support and agree, although modifications proposed must favor native aquatic species. (Individual, No Address - #53)

Sample Statement:

Action EM-F10-A1: (We propose to adopt the majority of the interim management direction contained in INFISH and PACFISH, with minor modifications to Riparian Management Objectives. In addition, we propose to make minor modifications to standards and guidelines to better fit local conditions and capabilities within RHCAs.) FOB is very concerned with the statements at EM-F10 and EM-F10-A1 referring to proposed changes in the INFISH RMOs and standards. Frankly, at this stage in the process, it appears to us that any proposed weakening of the RMOs/standards will substantially increase the risks to the watersheds and native fisheries. It also appears to be another attempt to prop up (or increase) the timber outputs from these lands. (Preservation/Conservation, Hamilton, MT - #720)

Sample Statement:

INFISH was an important interim measure to maintain and protect aquatic resources until a long-term strategy could be developed. This long-term strategy is needed and will be an important outcome of the revised forest plan. As the Forest Plan is further developed, we will be interested to see how INFISH, or a similar strategy for aquatic resource protection, is incorporated in the plan. INFISH has been very beneficial to streams and fisheries. (State Agency or Official, No Address - #694)

PC #: 564

Public Concern: The FS should continue to implement PACFISH and INFISH as written. These strategies already allow site-specific modifications.

Sample Statement:

Action EM-F10-A1 (We propose to adopt the majority of the interim management direction contained in INFISH and PACFISH, with minor modifications to Riparian Management Objectives. In addition, we propose to make minor modifications to standards and guidelines to better fit local conditions and capabilities within RHCAs). We support retaining INFISH and PACFISH interim riparian strategies as a minimum for protecting aquatic communities. The forests say they will adopt "the majority" of these interim management directions. It is unclear what "majority" means. The forests say they "propose to make minor modifications to standards and guidelines to better fit local conditions and capabilities within the RHCAs." This is unnecessary. Implicit to I] and PACFISH is an allowance for modifications from default standards and guidelines as long as the changes are based on site-specific analysis. (Preservation/Conservation, Missoula, MT - #488)

PC #: 554

Public Concern: The FS should not consider or analyze the viability of pest species like the mountain pine beetle.

Sample Statement:

Action EM-F1-A1: (We propose to use sustainability and viability as the underlying ecosystem management principles. We propose to use these principles to provide for human needs and to conserve species for present and future generations.) Some members of the group expressed concern with the terms sustainability and viability. They said they feared that courts would look at the viability of a particular population in a particular spot, rather than across the entire forest or ecosystem, and would use viability as a pretext to shut down timber production in the forest. One person called said the language raised "a little red flag." Although we tend to think of deer and elk, viability could also involve certain beneficial insects and beetles. Some expressed a desire to change the wording to remove the pretext for legal challenges. To underscore his opposition to the word "viability," another participant said at some point the the USFS might need to manage for viability of the pine beetle population. Another participant said it sounded as though the forest would need to protect the artificial as well as the natural forest. "You're going to be forced into protecting this artificial, unhealthy forest." Garry agreed that if a species were dependent on that unhealthy forest, yes, they would have to preserve it in that state. "We would have to keep a certain percentage of the landscape in that condition so that species could be carried on." Garry suggested changes to the term "viability" are not in the public's "decision space." The group considered some wording that would indicate a scale for viability (ecosystem). The group also considered the language, "Healthy ecosystem management will be based on balancing sustainability and viability principles with human needs." The group could not reach consensus on any language changes, but could live with the existing wording. (Place Based Groups, No Address - #825)

PC #: 558

Public Concern: The FS should consider the conflict between TES species recovery and wildlife important for viewing.

Sample Statement:

[I don't like Action] EM-F9-A1 (We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns. We also propose to

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emphasize management of habitat for species important for hunting or viewing.)[because]...wouldn't their likely be a conflict between recovering sensitive threatened and endangered species and emphasizing habitat for species important for hunting and viewing? This action isn't well thought out. You can't have it all. (Individual, Missoula, MT - #466)

PC #: 561

Public Concern: The FS should conserve, protect, and restore water quality, native aquatic species, aquatic plants, amphibians, and air quality.

Sample Statement:

Each alternative should describe specific management and restoration strategies for native aquatic species at risk (of endangered status or extinction). (Individual, Bozeman, MT - #577)

Sample Statement:

Fish and wildlife. We support efforts to restore native fish and wildlife populations. We support efforts to study and restore native amphibian populations, unheralded species that likely play an important role in forest ecosystems. We support maintaining recreational opportunities, including harvest of fish and wildlife. (Individual, Hamilton, MT - #292)

Sample Statement:

A forest-wide analysis of the effects of fish stocking on amphibian, invertebrates, and other aquatic species should be completed and a management plan formulated that places highest priority on restoration of native species. An interdisciplinary team should be formed to design a network of refugia for amphibians and aquatic invertebrates within historic fishless areas. Removal of introduced fish from designated refugia should be conducted in the least ecologically damaging manner possible according to a restoration plan developed with the assistance of the interdisciplinary team, and under no circumstances should rotenone or other toxic substances be used to eradicate introduced fish. Impacts to sport fisheries should be balanced against the need to recover native fish and non-fish species. (Preservation/Conservation, Bozeman, MT - #706)

PC #: 586

Public Concern: The FS should ensure a proper range and number of MIS that accurately reflect management impacts, and can be monitored. Consider pine marten, Northern goshawk, Westslope cutthroat trout, and T & E species.

Sample Statement:

[Action EM-F8-A1: We propose to update our management indicator species to better reflect the effects of management activities and to promote consistency where appropriate.] Action EM-F8-A1 In developing more consistency between the forests on management indicator species (MIS) to simplify and improve monitoring and management, the Forests must ensure that a proper range and number of MIS are maintained and monitored that reflect well the impact of all management actions on species and ecosystems. Monitoring for MIS instead of all species is already a shortcut for meeting the NFMA's requirement to maintain viable population of native species. The Forests must be careful not to take advantage of this shortcut by choosing as MIS a limited number of species that do not represent the full range of species impacted by management activities on each forest. For example, the Forests should not rely heavily on species that utilize edge or early successional habitats to the exclusion of native species that benefit from less or no management action. We feel that the pine marten, northern goshawk, Westslope cutthroat trout as well as all threatened and endangered species should be included among the MIS on all three forests. (Preservation/Conservation, Missoula, MT - #566)

Sample Statement:

Management Indicator Species (MIS) must be treated with consistency across these three forests, and should truly be representative of the species that will serve as surrogates for other impacted species. MIS should be reasonably easy to monitor - no excuses this time. For example, the Flathead's choice of MIS for old-growth forests in Amendment #21 does not adequately represent the needs of closed-canopy old-growth species and by virtue of being on the sensitive species list are already scarce and therefore not easily monitored. (Business, Missoula, MT - #616)

Sample Statement:

Finding EM-F8. The list of indicator species prompted questions regarding the differences between the three National Forests in their selection of indicator species: a. Why did the Flathead Forest not select an indicator species for old growth?

b. Why did the Bitterroot Forest not select a Threatened and Endangered (T&E) species? c. Why is the westslope cutthroat

trout not designated by the Lolo Forest as an indicator species, given that it is a Species of Special Concern for Montana and the US Fish and Wildlife Service? d. What species are on the Flathead Forest sensitive species list? e. What criteria

are used in selecting a sensitive species or designating a species as an indicator? f. Will there be any effort to standardize

the selection process and/or the list across the three National Forests, since all the species listed in Table 1 are present in all three forests? g. We recommend being specific about what the indicator species is indicating or representing. For

example, aquatic organisms could indicate sedimentation or passage barriers, or old growth and T&E species could indicate too-little old growth or forest habitat diversity. Where needed we recommend the Forest Plans be specific on what are the

indicator species, how these species will be monitored, and what will be the assessments (e.g., monitoring effects of timber harvest). (State Agency or Official, Missoula, MT - #697)

PC #: 584

Public Concern: The FS should consider migratory life history strategies and minimum populations viability estimates for Westslope cutthroat trout and bull trout as indicators of connectivity.

Sample Statement:

Action EM-F9-A1 (We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns. We also propose to emphasize management of habitat for species important for hunting or viewing). The forests should examine the appropriateness of using westslope cutthroat trout, bull trout and tailed frogs as indicator species. In addition, the forests should seriously consider selecting migratory life-history strategies and minimum population viability estimates for cutthroat and bull trout as indicators of habitat connectivity. (Preservation/Conservation, Missoula, MT - #488)

PC #: 183

Public Concern: The Forest Service should not update the management indicator species (MIS) list.

Sample Statement:

Action EM-F8-A1: (We propose to update our management indicator species to better reflect the effects of management activities and to promote consistency where appropriate.)Opposed (Individual, Hamilton, MT - #233)

PC #: 583

Public Concern: The FS should consider Westslope cutthroat trout, bull trout, and tailed frogs as MIS

Sample Statement:

Action EM-F9-A1 (We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns. We also propose to emphasize management of habitat for species important for hunting or viewing). The forests should examine the appropriateness of using westslope cutthroat trout, bull trout and tailed frogs as indicator species. In addition, the forests should seriously consider selecting migratory life-history strategies and minimum population viability estimates for cutthroat and bull trout as indicators of habitat connectivity. (Preservation/Conservation, Missoula, MT - #488)

Section: Management of Fish, Wildlife and Plants of Special Concern

PC #: 548

Public Concern: The FS should capture and transport bears to provide for genetic exchange, instead of focusing on habitat security (i.e. road closures).

Sample Statement:

I caution that continued recovery of the grizzly is not an excuse that can be used to eliminate access and multiple uses. It should be noted that the grizzly is doing well. A more cost effective and economic means of encouraging genetic diversity would be to capture and transport a few animals across ranges. (Individual, Dickinson, ND - #535)

PC #: 541

Public Concern: The FS should integrate the Montana State Grizzly Bear Plan and Conservation Strategy into the forest plans.

Sample Statement:

The State of Montana Grizzly Bear Management Plan and Conservation Strategy are currently being developed for the NCDE and western Montana, with an expected completion date approximately 18 months from now. We ask that the new Forest Plans be written expecting that the state plan and conservation strategy eventually will be an integral part of the Forest Plans. We hope that, once complete, the new Forest Plans could easily accept the plan and strategy for managing this

important species. (State Agency or Official, Missoula, MT - #697)

PC #: 542

Public Concern: The FS should protect wildlife and plants and their habitats, particularly population strongholds and rare species.

Sample Statement:

The Plan should also include a thorough viability assessment of current populations of existing native wildlife and aquatic species, identifying the pressures and threats on these native populations. Objectives and standards must be included to protect wildlife movement, key wildlife habitats, fisheries, and clean water. (Individual, Bozeman, MT - #577)

Sample Statement:

In the preparation of the Environmental Impact Statement, I urge you to protect wildlife habitat and to conserve our natural resources. (Individual, Sherman Oaks, CA - #782)

Sample Statement:

The Northern Rockies are distinct from the rest of the lower 48 states. We share these three forests with wolves, black bears, grizzly and cutthroat trout, among countless other sensitive species, and it is important to plan ahead to keep populations healthy. (Individual, Missoula, MT - #936)

PC #: 553

Public Concern: The FS should analyze the viability of terrestrial and aquatic species, particularly those that are threatened, endangered, or sensitive.

Sample Statement:

The Plan should also include a thorough viability assessment of current populations of existing native wildlife and aquatic species, identifying the pressures and threats on these native populations. Objectives and standards must be included to protect wildlife movement, key wildlife habitats, fisheries, and clean water. (Individual, Bozeman, MT - #577)

PC #: 557

Public Concern: The FS should not construct any new roads to protect habitat for species at risk.

Sample Statement:

On the issue of endangered species, please change course and take a firm stance on following the law to protect endangered species habitat - particularly the lynx (reference destruction of habitat in the Swan Valley), grizzly bear, and bull trout. Please, NO NEW ROADS in areas important to wildlife use. (Individual, Hot Springs, MT - #516)

PC #: 559

Public Concern: The FS should develop measurable goals, benchmarks, and monitoring tools for recovery of threatened and endangered species.

Sample Statement:

Action EM-F9-A1 (We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns. We also propose to emphasize management of habitat for species important for hunting or viewing). The forests should specify measurable goals, benchmarks and the monitoring tools to be used for achieving the objective of recovering threatened and endangered species. Without these specifics, this action is not very meaningful. (Preservation/Conservation, Missoula, MT - #488)

PC #: 562

Public Concern: The FS should recover bull trout and impaired waters through science-based management standards.

Sample Statement:

Recovery of Threatened Bull Trout Populations and Restoration of WQLS Streams Several Key Watersheds for recovery of bull trout have been identified by the Montana Bull Trout Scientific Group on the Bitterroot, Flathead and Lolo National Forests. (Preservation/Conservation, Helena, MT - #341)

Sample Statement:

Critical Habitat designation of streams as purposed by the USFWS; including protection of core and nodal bull trout habitat.

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(Preservation/Conservation, Missoula, MT - #719)

Sample Statement:

Key Bull Trout Watersheds and Impaired Water Bodies - I support the application of scientifically based standards for the protection of bull trout critical habitat (Business, Polebridge, MT - #145)

PC #: 547

Public Concern: The FS should cooperate with other agencies and land owners in the development of bear education programs, designed to minimize bear and human conflicts.

Sample Statement:

Action EM-F6-A1: (We propose to develop consistent guidance on the three forests to eliminate or minimize human-caused food sources for bears.)And to coordinate these with landowners and managers of tribal, state, private and other government agencies. (Individual, Condon, MT - #312)

Sample Statement:

Action EM-F6-A1(We propose to develop consistent guidance on the three forests to eliminate or minimize human-caused food sources for bears.): We propose to develop consistent guidelines with local and community collaboration on the three forests to eliminate or minimize human-caused food sources for bears. (Place Based Groups, No Address - #822)

Sample Statement:

EM-F6: (We propose to develop consistent guidance on the three forests to eliminate or minimize human-caused food sources for bears.) The Forests also need to be actively involved in mitigating or reducing bear-human- conflicts on private land adjacent to National Forest. Cooperation with other agencies on education and prevention is needed. Easements or purchase of private land in prime grizzly bear habitat adjacent to USFS land should be pursued. (Individual, Columbia Falls, MT - #534)

PC #: 550

Public Concern: The FS should stop managing for single species, and focus more on managing all species and ecosystems for biodiversity.

Sample Statement:

The Forest Service must get away from micro managing single special species IE the Grizzly Bear, Lynx and old growth timber. All species of the forest should be managed by one plan. (Business, Kalispell, MT - #528)

Sample Statement:

[Action EM-F9-A1: We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns. We also propose to emphasize management of habitat for species important for hunting or viewing.]Action EM-F9-A1Because of the critical role National Forest lands play in providing habitat for threatened, endangered and sensitive species, we feel that managing to ensure their viability should be a focus. While wildlife viewing is indeed a growing recreational past time, we do not, however, feel that management should focus solely on those species defined by the Forest as important for hunting or viewing. For example, based on the threatened determination by the FWS, the Forests have a responsibility to improve their management practices to benefit Lynx. This, however, is a species that will rarely be viewed by humans We also feel that the Forests have had too great an emphasis on managing species important for hunting, and should rather take a broader look at the needs of all the species in the ecosystem. (Preservation/Conservation, Missoula, MT - #566)

Sample Statement:

We need to refer to species in general, not just endangered species. We want to keep species at risk from becoming extinct. Comment: Grizzly bears and Lynx, wolves...do we turn a historical species to a historical habitat? You're managing the habitat rather than the species? A: Yes. (Place Based Groups, Missoula, MT - #826)

Sample Statement:

We must also get away from single species management of Forest Land. (Timber or Wood Products Industry, Columbia Falls, MT - #443)

Sample Statement:

Action EM-F2-A2: (We propose to use values and ecosystems at risk as primary considerations when managing to reduce the hazard of large-scale insect and disease infestations and severe wildland fires. Examples of values and ecosystems at risk include but are not limited to such things as public and firefighter safety, homes, communication sites, municipal watersheds, and threatened, endangered, sensitive species habitat.) I would like to see this action worded with more specificity, including listing the particular species at risk that will be considered in management plans, yet leaving room for additional species as the need arises.While I realize the purpose of the Proposed Action is not to become specific about

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management actions, for the record I would like to state my concerns regarding management for species at risk. I am particularly concerned about management for listed species, such as lynx and grizzlies. Given present conditions and trends, managers need to put into practice the most current goals for viable populations for all native species, with the caveat that a species approach to conservation cannot alone protect biodiversity across the breadth of the forest. (Individual, Bigfork, MT - #475)

PC #: 546

Public Concern: The FS should develop balanced management direction for grizzly bear security that focuses more on seasonal road closures, as opposed to permanent closures or decommissioning. More flexibility is needed to allow elk harvest by hunters.

Sample Statement:

FWP supports limitations on vehicular access because such restrictions allow elk and other species to use preferred habitats and help perpetuate Montana's relatively liberal hunting seasons. Elk populations are currently at high levels and above population objectives in some areas, and we anticipate that we may need to request temporary road openings to motorized use during the general hunting season over the next few years in some specific areas to increase elk harvest. We ask that the new Forest Plans be flexible enough to accommodate this sort of action. (State Agency or Official, Missoula, MT - #697)

Sample Statement:

Action AM-F5-A1: (We propose to have access management within Northern Continental Divide Ecosystem (NCDE) grizzly bear recovery zones better integrate social concerns with recovery needs of the grizzly bear.)I like this action because Amendment 19 of the existing Flathead Forest Plan unnecessarily restricts motorized access. The road density standards set for Amendment 19 were based upon a preliminary report. The final report of that study had no conclusions or recommendations for the destruction of roads. So we have not been using the best available science in the management of our road system. We need to have a more balanced approach to bear security and needs and social uses of the forests than provided in Amendment 19. Seasonal and/or road closures should be used instead of permanent closures or decommissioning of roads. (Individual, Columbia Falls, MT - #673)

PC #: 544

Public Concern: The FS should continue to implement road density standards as written in Amendment 19 on the Flathead National Forest.

Sample Statement:

I feel Amendment 19 should be followed. The more roads you have the more garbage further back in the woods you will have to deal with, not to mention the possibility of the Bears getting a hold of that garbage and becoming habituated. (Individual, Columbia Falls, MT - #330)

Sample Statement:

We recommend the following: Both the Flathead and Lolo national forests (FNF & LNF respectively) manage lands within the Northern Continental Divide Ecosystem (NCDE) for grizzly bears. The undisputed "best available science" in this ecosystem regarding motorized access management standards is contained in Amendment 19 (A19) to the Flathead Forest Plan. The FNF must immediately and completely abandon its policy of under-funding and foot-dragging on these binding standards, and see that they are fully implemented as required by law. The LNF must move immediately to incorporate these same "best science" standards on all occupied grizzly habitat within its boundaries. The Bitterroot should begin phasing these standards in over the next decade. Doing so now will also improve elk habitat security and water quality, while lowering the road maintenance budget in the long term. (Preservation/Conservation, Columbia Falls, MT - #525)

Sample Statement:

[Action AM-F5-A1: We propose to have access management within Northern Continental Divide Ecosystem (NCDE) grizzly bear recovery zones better integrate social concerns with recovery needs of the grizzly bear.]Action AM-F5-A1We are extremely concerned by the implications of your statement that access management within the Northern Continental Divide Ecosystem better integrate social concerns with recovery needs of the grizzly bear. Amendment 19 defines minimum standards for maintaining quality habitat for grizzly bears. While we are not sure what additional "social integration" would mean, it should not further compromise these minimum standards. Habitat provided on National Forests is crucial to the continued survival and recovery of grizzly bears in the NCDE. It is well established that bears avoid roads and that bear survival can be compromised by increased contact with humans, facilitated by roads. (Preservation/Conservation, Missoula, MT - #566)

PC #: 545

Public Concern: The FS should wait for the results of the grizzly bear DNA study prior to developing management direction for habitat security, and in the meantime, stop closing roads.

Sample Statement:

One of the most highly contentious issues centers on the adoption of Amendment 19 to the Forest Plan as a mitigation measure to secure court-ordered grizzly bear habitat. Recent and ongoing grizzly bear studies indicate that there is a high degree of certainty that grizzly bear populations have recovered in most of the northern continental divide ecosystem and particularly within the boundaries of the Flathead National Forest. As you know the US Geological Survey (USGS) "Grizzly Bear DNA" study will be completed about the time the final Flathead Forest Plan Environmental Impact Statement is ready for adoption. Along with the USGS DNA study, the US Fish and Wildlife Service (USFWS) has received a federal appropriation to update decades old research on how grizzly bears interact with road systems. Therefore, the Forest simply must remain flexible and open to modifying Amendment 19 as new data is compiled and analysis is brought forward for review. In the meantime, appropriate mitigation measures would include seasonal closures and modified gate designs. (Timber or Wood Products Industry, Missoula, MT - #938)

Sample Statement:

Accommodate local cultural concerns and traditions in forest policy. (As recent news has told, more than a few grizzlies have found themselves happily exploring human/private habitats. And stories from Yellowstone have shown that humans and bears co-habitat. The case that grizzlies need security by reducing roads and limiting motorized access has many flaws and has been biased by narrow perspectives. Current direction in Forest Planning has been unduly influenced by radical agendas. Leaving large unmanaged landscapes to unchecked natural processes is dangerous and foolish.) Require any assessments needed by the US Fish and Wildlife Service to go through a review process by a team on the Flathead National Forest and require that recommendations be generated from a team process rather than by one employee with no review locally. Any closures of roads must be based in science and data supporting closure even if temporary. Stop tearing up roads until grizzly numbers are found out accurately. If the Forest Service finds that bear numbers are going up, reopen roads that have been decommissioned. (Place Based Groups, No Address - #967)

Sample Statement:

No mention was made in the plan concerning Amendment 19 and should not be until the DNA grizzly bear study is complete, and we have an accurate, scientific study of bears and geographical concentration. All concerns in Amendment 19 be ceased, such as decommissioning of roads, until such data has been, for once, based on scientific facts. In addition to Amendment 19 - the Final Report issued in 1997 had no conclusions or recommendations for destruction of roads. Instead the Report concluded that "strict road access programs on National Forest land will not be significant to significantly improve the population trajectory if mortality and habituation of bears on private lands is not reduced" and recommended seasonal road closures. The USFWS has never updated their opinion based on the best science available (the Final Report) nor has the FNS attempted to revise or amend the plan in that respect. Amendment 19 was processed through NEPA as an EA with a finding of FONSI. However, this Amendment has had major impacts on fire management, recreation, the local economy, timber management, public access, etc. Therefore, FONSI was inappropriate and should be considered unlawful. The economic cost to decommission these roads (\$7,000/mile for 900+ miles) would be almost \$12 million dollars. That doesn't include, if we ever replace these roads, the additional cost. Wouldn't it be more prudent to put the \$12 million dollars toward fire prevention, fire fighting, or another worthwhile project? Road obliteration is clearly not required for many other reasons, and the "Final Report" on Page 33 "no strong relationships were observed for closed road density and bears." (Individual, Bigfork, MT - #621)

PC #: 543

Public Concern: The FS should stop closing roads and not implement road density standards in Amendment 19 on the Flathead National Forest.

Sample Statement:

...the Northern Continental Divide Ecosystem (NCDE), outside of Glacier National Park, has grizzly bear population densities of about 1 bear per 20-30 square miles and has human recreation consisting of motorized access, motorized recreation, hiking, fishing, camping, horseback riding, and big game hunting. Glacier National Park annually receives approximately 2-3 million visitors, does not allow hunting, and has grizzly bear population densities estimated at about 1 bear per 8 square miles. The Yellowstone Ecosystem (YE) which is comprised of Yellowstone Park and surrounding National Forests, receives more visitation than Glacier Park and has an increasing grizzly bear population estimated at 1 bear per 30-50 square miles (<http://www.r6.fws.gov/endspp/grizzly/bittereis/deischp2.htm>). All indications are that grizzly bear habitat is fully occupied and that additional road closures and obliteration will not produce any more bears and, therefore, motorized closures are not reasonable or productive. Therefore, grizzly bears can coexist at reasonable population densities with multiple-use recreation and there is no compelling reason to close roads and trails to motorized recreationists to increase grizzly populations because the most significant constraint is their need for so many acres between other grizzly bears. (Recreational, Helena, MT - #339)

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Sample Statement:

Action AM-F5-A1: (We propose to have access management within Northern Continental Divide Ecosystem (NCDE) grizzly bear recovery zones better integrate social concerns with recovery needs of the grizzly bear.)I like this action because Amendment 19 of the existing Flathead Forest Plan unnecessarily restricts motorized access. The road density standards set for Amendment 19 were based upon a preliminary report. The final report of that study had no conclusions or recommendations for the destruction of roads. So we have not been using the best available science in the management of our road system. We need to have a more balanced approach to bear security and needs and social uses of the forests than provided in Amendment 19. Seasonal and/or road closures should be used instead of permanent closures or decommissioning of roads. (Individual, Columbia Falls, MT - #673)

Sample Statement:

I personally do not like Amendment 19. I don't believe that limiting the public access to the forest will adversely affect the numbers of grizzly bears. Everyone has the right to use the forest any way they want to. Weather it is hiking, skiing, or motorized use. I love the freedom of snowmobiling, and would love to have my children learn the sport. To show them that there is lots of choices in the way they can enjoy our forest. Hunting, fishing and all other types of recreation. (Individual, Coram, MT - #794)

PC #: 539

Public Concern: The Forest Service should consider grey wolf and grizzly bear as Management Indicator Species, as well as old growth habitat on the Bitterroot and Lolo National Forests.

Sample Statement:

EM-F8: (We propose to update our management indicator species to better reflect the effects of management activities and to promote consistency where appropriate.) Why are there no indicator species for old growth on the Flathead? Grizzly bears and grey wolves need to be added as Bitterroot Forest indicators in anticipation of their reintroduction and/or natural dispersal. (Individual, Columbia Falls, MT - #534)

Sample Statement:

Action EM-F8-A1: (We propose to update our management indicator species to better reflect the effects of management activities and to promote consistency where appropriate.)Action EM-F8-A1: The grizzly bear and wolf should be added to the Bitterroot National Forest in anticipation of reintroduction or natural re-colonization of these species. Action EM-F9-A1: (We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns. We also propose to emphasize management of habitat for species important for hunting or viewing.)Action EM-F9-A1: Again, the FS should go forward with T&E recovery in the spirit of demonstrating sound management AND public education. Include the public in this effort. Provide education, public outreach, and commit to making the job easier for managers by providing information to the public. (Preservation/Conservation, Kalispell, MT - #256)

Sample Statement:

EM-F8:Why are there no indicator species for old growth on the Flathead? Grizzly bears and grey wolves need to be added as Bitterroot Forest indicators in anticipation of their reintroduction and/or natural dispersal. (Preservation/Conservation, Polebridge, MT - #705)

PC #: 552

Public Concern: The FS should use vegetation management (including timber harvest) as a tool to provide habitat diversity, particularly for listed species.

Sample Statement:

Action EM-F9-A1: (We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns. We also propose to emphasize management of habitat for species important for hunting or viewing.)Timber management is necessary to provide the diversity of habitat that was once the natural, wildfire maintained, norm for western Montana. (Place Based Groups, Paradise, MT - #258)

Sample Statement:

Emphasis on the Endangered Species Act should be on cultivating food sources for the endangered species rather than eliminating roads or restricting human access Present policies, sometimes based on questionable studies, lean toward preventing multiple uses of Federal lands. (State Agency or Official, Kalispell, MT - #329)

Sample Statement:

We need an active timber sale program that effectively harvests the sustained yield of the land. The second objection to this proposed program will be endangered species, particularly the Grizzly Bear. I believe that roads do not keep bears from using an area. The bears main concern is food so lets concentrate on managing bear habitat by creating more food for the

bear. This could involve planting non-native species. (Individual, Kalispell, MT - #506)

PC #: 549

Public Concern: The FS should evaluate road density standards in Amendment 19, and explore standards for individual BMUs. Any new standards should be science-based.

Sample Statement:

Therefore, the revision process should outline a scientific approach to calculation of new road density standards and core habitat requirements for grizzly bear habitat on the three forests which will promote grizzly bear recovery. Additionally, linkage corridors and restoration areas are vital to protection and restoration of grizzly bear habitat and genetic integrity. (Preservation/Conservation, Helena, MT - #341)

Sample Statement:

Action EM-F5-A1: (We propose to identify linkage zones at the landscape scale to facilitate species movement and genetic exchange.) Truly integrating "social concerns with the needs of the grizzly bear" would actually result in additional road closures. Motorized recreation is not the only social concern. We believe practicality may dictate some modification of A-i 9on an individual management unit basis. But the bottom line must still be conservation of grizzly bear habitat and security areas throughout the recovery area. (Individual, Columbia Falls, MT - #534)

Sample Statement:

One of the most highly contentious issues centers on the adoption of Amendment 19 to the Forest Plan as a mitigation measure to secure court-ordered grizzly bear habitat. Recent and ongoing grizzly bear studies indicate that there is a high degree of certainty that grizzly bear populations have recovered in most of the northern continental divide ecosystem and particularly within the boundaries of the Flathead National Forest. As you know the US Geological Survey (USGS) "Grizzly Bear DNA" study will be completed about the time the final Flathead Forest Plan Environmental Impact Statement is ready for adoption. Along with the USGS DNA study, the US Fish and Wildlife Service (USFWS) has received a federal appropriation to update decades old research on how grizzly bears interact with road systems. Therefore, the Forest simply must remain flexible and open to modifying Amendment 19 as new data is compiled and analysis is brought forward for review. In the meantime, appropriate mitigation measures would include seasonal closures and modified gate designs. (Timber or Wood Products Industry, Missoula, MT - #938)

PC #: 580

Public Concern: The FS should not consider pine marten or Northern goshawk as MIS because they are too rare.

Sample Statement:

Action EM-F8-A1: (We propose to update our management indicator species to better reflect the effects of management activities and to promote consistency where appropriate.) EM-F8 Indicator Species Long experienced western Montana woods workers and recreationists queried in our group attested to the fact that sightings of pine martin and northern goshawk are very rare. Though rare and seldom observed, either can be found in mature as well as immature forests - even in lodgepole pine stands. These rare animals are probably too rare to be considered an indicator species. (Place Based Groups, Paradise, MT - #258)

PC #: 578

Public Concern: The FS should consider natural disturbances in terms of size, frequency, and intensity to provide lynx habitat. Plans should be conservative in retaining key habitat components.

Sample Statement:

Regarding lynx, I would like to see the new forest plan address the following objectives and issues: Use natural disturbance patterns, in terms of size, frequency, intensity and stochasticity for guidance concerning the design and management of landscapes. Engage in spatially explicit landscape planning within very large management areas. A system of reserves maintained by policy or regulation, embedded in an increasingly fragmented and unnatural matrix can't provide for sustainable lynx populations. Inevitable large-scale catastrophes preclude this from being a sustainable system from the standpoint of lynx conservation. According to K. S. McKelvey (Ruggiero et al, tech eds., Ecology and Conservation of Lynx in the United States, University of Colorado Press, Boulder, Colorado, 2002) a population of less than 50 spatially isolated lynx can't be considered a viable population. Existing lynx habitat management plans in the contiguous United States generally focus on relatively small spatial scales and emphasize the production of young forest to provide foraging habitat, and the maintenance of a few, small patches of older forest to provide denning habitat. This approach is based on an untested hypothesis. When faced with uncertainty concerning the biological needs of lynx, land management plans must be conservative in their retention of habitat components. (Individual, Bigfork, MT - #475)

PC #: 579

Public Concern: The FS should manage for a continuum of forest age classes and less even aged silviculture, as well as late successional forests to provide habitat for hares, red squirrels, and lynx.

Sample Statement:

Manage for landscape that contains a continuum of age classes, including both very young and very old forest, and a lower proportion of even-aged silviculture. This management strategy should emphasize the potential importance to lynx of late-successional forests as habitat for hares, red squirrels, and lynx in the southern part of their range. Older forests are temporally stable, and produce hares in lower, but more reliable numbers, and provide squirrels as alternative prey. Provide for a variety of regeneration conditions and emphasize treatments that depend on natural regeneration rather than planting. Practice adaptive management and consider every action on the landscape to be an experiment. Biologists know very little about lynx ecology in the contiguous United States. Management practices based on this partial knowledge are necessarily incomplete. Lynx biologists such as L. F. Ruggiero are reluctant to put forth even qualified insights due to lack of empirical information. (Individual, Bigfork, MT - #475)

PC #: 569

Public Concern: The FS should not leave culverts in closed or decommissioned roads because they can adversely affect water quality and fish habitat. The FS should consider these effects when closing or decommissioning roads for grizzly bear security.

Sample Statement:

The revised plan should address potential conflicts between providing grizzly bear core habitat management and maintaining aquatic habitat. When grizzly bear core habitat was created, many roads were closed that still have culverts and road prisms across sensitive land types. Although some culverts have been removed to help deter motorized vehicle use, some remain to facilitate snowmobile use during winter. Since these roads are not maintained, there is an increasing risk of failures over time that would be detrimental to water quality and fisheries habitat. Although, entering these closed roads to remove culverts and unstable roadbeds could lead to a temporary reduction in grizzly bear core habitat, we support a temporary reduction in security for the long-term benefit of aquatic resources. The water quality, and fishery habitat needs should be managed with equal status relative to wildlife security issues. (State Agency or Official, No Address - #694)

PC #: 577

Public Concern: The FS should consider the negative impacts of T & E species protection on private land owners.

Sample Statement:

Action EM-F9-A1(We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns. We also propose to emphasize management of habitat for species important for hunting or viewing.):We propose to continue to contribute to the recovery of threatened and endangered species and manage conditions affecting Forest Service sensitive species to reduce their viability concerns without creating negative impact and conflict with private landowners. (Place Based Groups, No Address - #822)

PC #: 30

Public Concern: The Forest Service should not adopt single species management rules.

Sample Statement:

The new Forest Plan should not be a testing ground for more single species management rules. Each time we exempt management activities in order to secure habitat for T & E species, we do so at the expense of another species. Where single species management has already been adopted, we are all too well aware of the management obstacles that follow i.e.: road closure and density restrictions, hiding cover prescriptions, seasonal restrictions on thinning or restoration harvests, and maintenance of forage areas. These habitat management guidelines are always passed off as easy to apply rules that will not significantly change the current management options. Once adopted, however they always have more impact than intended because they aren't implemented or tested ahead of time. It is critical that the Forest Service implement all changes in management policy for several years across different landscapes prior to adopting them. It is critical that any new habitat restrictions be applied and tested before they are implemented. Their affect on other uses of the forest and economic

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consequences must be fully displayed. (Individual, Columbia Falls, MT - #438)

Sample Statement:

Growth and sprawl are leading to significant pressures on public lands and wildlife. Recreational development and disturbances are problems as well. Wildlife is being displaced as recreation spreads to even the most remote of locations. The ultimate threat to most species is loss of habitat as a result of human population, behavior, and attitudes." NOTE - citations supplied in original paper (Preservation/Conservation, Missoula, MT - #719)

Section: Forested Vegetation

PC #: 596

Public Concern: The FS should focus on retention of large trees, and manage areas affected by insects and disease to avoid catastrophic fuel loading or destruction of surrounding stands.

Sample Statement:

Bitterroot National Forest Plan Revision Proposed Action Management direction for old growth snags and downed woody material is addressed in Action EM-F4-A1, suggesting that the Forest Service; is proposing to modify management directions in each category. The Proposed Action is to consider what the historical ranges were at the three-forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development and fire intensity. We believe the scientific analysis supporting old growth stands in Region One maybe superior to other regions. Therefore, if old growth standards are to be modified, we strongly suggest the zone team meld the old growth language from the Healthy Forests Restoration Act (HFRA) where appropriate so as not to cause internal management conflicts. The HFRA management direction specifically states that in carrying out a project, the Secretary shall fully maintain, or contribute to the restoration of the structure and, composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type. Projects should ideally focus on small diameter trees and maximize retention of large trees. In the case where forest stands have become diseased and subject to stem and root decay, these stands need to be managed so as not to further add to catastrophic fuel loading or the destruction of surrounding stands. Old growth stands should not be accelerated, as suggested in some Proposed Actions, by increasing percentage of seral stages or increasing harvest rotations. (Timber or Wood Products Industry, Kalispell, MT - #539)

PC #: 599

Public Concern: The FS should resolve the old growth issue by establishing minimum management requirements, assessment of existing conditions, and the need for change.

Sample Statement:

Finding EM-F4-A1: The "old growth" issue has been around for over 20 years. Old growth like any other timber stand condition is ephemeral, changing over time as natural succession proceeds and agents of change modify stands. It is likely that more "old growth" has been destroyed by fires in the past 4 years than all the timber harvest ever. For example, approximately 350,000 acres (15%) of the Flathead National Forest has ever had a timber harvest of any kind. Less than 250,000 acres (10%) have been regenerated through timber harvest over a period of 60 years less than 0.2% per year. Approximately 350,000 acres have burned just in the US portion of the Flathead river basin since 2001. Allocating land to a long term old growth land use is infeasible. Such an allocation does not insure that old growth will actually be produced. Any land capable and potentially suitable for timber production has the potential to produce old growth if a catastrophic fire does not interrupt natural succession. In a managed forest, existing old growth stand structure can be restored and protected through management practices controlling the fire fuel and insect and disease environment. The old growth issue must be resolved by establishing minimum management requirements, assessment of existing conditions and need for change as required (36CFR219.12). No such analysis exists in the AMS or proposed action. (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

Action EM-F4-A1: (We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.) This action certainly should have been done a decade or more ago, and it certainly should have been done as part of the AMS (36CFR219.12(c-d). This is an issue that the USFS cannot solve alone. Collaboration with other Federal agencies, State agencies, and professional and academic institutions on standard "best available science" definitions of "old growth" for the various forest vegetation groups is something that must take place in order for the issue to be addressed as required by NFMA in Forest Plans. Old growth criteria is necessary- to assess current conditions or make any progress in resolving the issue. (Individual, Kalispell, MT - #780)

PC #: 598

Public Concern: The FS should use timber harvest, thinning, and prescribed fire to enhance and establish old growth.

Sample Statement:

Action EM-F4-A2: (We propose to allow treatments of old growth stands to maintain or restore old growth conditions and reduce threats from disturbances such as insects, disease, wind and fire.)Regarding Action; EM-F4-A2I really like this because if it is interpreted correctly it will allow the removal of some old growth in order to restore old growth conditions. We should consider timber harvesting as a tool to enhance the old growth forest because we need to weed our gardens in order for the desired plants to grow. (Business, Essex, MT - #569)

Sample Statement:

Action EM-F4-A2(We propose to allow treatments of old growth stands to maintain or restore old growth conditions and reduce threats from disturbances such as insects, disease, wind and fire.): We propose to allow site specific treatments of old growth stands to develop, manage, maintain or restore old growth conditions and reduce threats from disturbances such as insects, disease, wind and fire. (Place Based Groups, No Address - #822)

Sample Statement:

Action EM-F4-A1: (We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.)Group accepted as written. Action EM-F4-A2: (We propose to allow treatments of old growth stands to maintain or restore old growth conditions and reduce threats from disturbances such as insects, disease, wind and fire.)The group reached consensus on the following rewrite of A2: "We recognize the importance of maintaining, restoring and recruiting old growth forests. Methods to achieve this goal would include thinning from below and broadcast burning. Natural process in higher forest elevations would be encouraged to achieve the goals." (Place Based Groups, No Address - #825)

PC #: 597

Public Concern: The FS should abandon Amendment 21 on the Flathead National Forest to reduce MIS, and restoration of old growth through logging.

Sample Statement:

We urge the Revision Team to abandon Flathead Forest Plan Amendment 21's reduction in MIS and its predisposition to "restore" old growth by logging it. Such "restoration" logging and opening of the forest canopy indeed increases problems with the growth of underbrush and ladder fuels, all the while harming the closed-canopy and down-woody attributes of the old-growth. We have included a copy of our Ponderosa Poster Child report for more discussion on this subject. (Preservation/Conservation, Kalispell, MT - #544)

PC #: 595

Public Concern: The FS should use the old growth language from the Healthy Forests Restoration Act in the planning process.

Sample Statement:

Bitterroot National Forest Plan Revision Proposed Action Management direction for old growth snags and downed woody material is addressed in Action EM-F4-A1, suggesting that the Forest Service; is proposing to modify management directions in each category The Proposed Action is to consider what the historical ranges were at the three-forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development and fire intensity. We believe the scientific analysis supporting old growth stands in Region One maybe superior to other regions. Therefore, if old growth standards are to be modified, we strongly suggest the zone team meld the old growth language from the Healthy Forests Restoration Act (HFRA) where appropriate so as not to cause internal management conflicts. The HFRA management direction specifically states that in carrying out a project, the Secretary shall fully maintain, or contribute to the restoration of the structure and, composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type. Projects should ideally focus on small diameter trees and maximize retention of large trees. In the case where forest stands have become diseased and subject to-stem and root decay, these stands need to be managed so as not to further add to catastrophic fuel loading or the destruction of surrounding stands. Old growth stands should not be accelerated, as suggested in some Proposed Actions, by increasing percentage of seral stages or increasing harvest rotations. (Timber or Wood Products Industry, Kalispell, MT - #539)

Sample Statement:

Bitterroot National Forest Plan Revision Proposed Action Management direction for old growth snags and downed woody material is addressed in Action EM-F4-A1, suggesting that the Forest Service; is proposing to modify management directions in each category The Proposed Action is to consider what the historical ranges were at the three-forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development

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and fire intensity. We believe the scientific analysis supporting old growth stands in Region One maybe superior to other regions. Therefore, if old growth standards are to be modified, we strongly suggest the zone team meld the old growth language from the Healthy Forests Restoration Act (HFRA) where appropriate so as not to cause internal management conflicts. The HFRA management direction specifically states that in carrying out a project, the Secretary shall fully maintain, or contribute to the restoration of the structure and, composition of old growth stands according to the pre-fire suppression old growth conditions characteristic of the forest type. Projects should ideally focus on small diameter trees and maximize retention of large trees. In the case where forest stands have become diseased and subject to-stem and root decay, these stands need to be managed so as not to further add to catastrophic fuel loading or the destruction of surrounding stands. Old growth stands should not be accelerated, as suggested in some Proposed Actions, by increasing percentage of seral stages or increasing harvest rotations. (Timber or Wood Products Industry, Kalispell, MT - #539)

PC #: 593

Public Concern: Old growth should be better defined.

Sample Statement:

Action EM-F4-A2 (We propose to allow treatments of old growth stands to maintain or restore old growth conditions and reduce threats from disturbances such as insects, disease, wind and fire).I am concerned that without a definition of "old growth" included in this section, that "treatments" may or may not be beneficial. (Individual, Missoula, MT - #510)

Sample Statement:

Action EM F4-A1:(We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.)This is an issue that the USFS cannot solve alone. Collaboration with other Federal agencies, State agencies, and professional and academic institutions on standard "best available science" definitions of "old growth" for the various forest vegetation groups is something that must take place in order for the issue to be addressed as required by NFMA in Forest Plans. Old growth criteria is necessary to assess current conditions or make any progress in resolving the issue. (Multiple Use or Land Rights, Bigfork, MT - #588)

Sample Statement:

Action EM-F4-A1: (We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.)This action certainly should have been done a decade or more ago, and it certainly should have been done as part of the AMS (36CFR219.12(c-d). This is an issue that the USFS cannot solve alone. Collaboration with other Federal agencies, State agencies, and professional and academic institutions on standard "best available science" definitions of "old growth" for the various forest vegetation groups is something that must take place in order for the issue to be addressed as required by NFMA in Forest Plans. Old growth criteria is necessary- to assess current conditions or make any progress in resolving the issue. (Individual, Kalispell, MT - #780)

PC #: 591

Public Concern: The FS should limit old growth treatments (insect and disease control) to non-harvest methods, including traps, pheromones, etc.

Sample Statement:

Action EM-F4-A2: (We propose to allow treatments of old growth stands to maintain or restore old growth conditions and reduce threats from disturbances such as insects, disease, wind and fire.)Action EM-F4-A2: We request that the FS specify that allowable treatments be limited to non-harvest techniques, including bait treats and pheromone trapping of insects. (Preservation/Conservation, Kalispell, MT - #256)

Sample Statement:

Action EM-F4-A2: (We propose to allow treatments of old growth stands to maintain or restore old growth conditions and reduce threats from disturbances such as insects, disease, wind and fire.)Noncommercial means of controlling insects in old growth should be emphasized. Bait trees and pheromone placement have frequently been sufficient. It needs to be recognized that dead and dying trees, are an integral part of an old growth forest. (Individual, Columbia Falls, MT - #534)

Sample Statement:

EM-F4-A2: (We propose to allow treatments of old growth stands to maintain or restore old growth conditions and reduce threats from disturbances such as insects, disease, wind and fire.)Noncommercial means of controlling insects in old growth should be emphasized. Bait trees and pheromone placement have frequently been sufficient. It needs to be recognized that dead and dying trees, are an integral part of an old growth forest. (Preservation/Conservation, Polebridge, MT - #705)

PC #: 602

Public Concern: The FS should prioritize actions that address insect and disease infestations, and consider the fire danger and economics associated with these disturbances.

Sample Statement:

Action EM-F2-A2: (We propose to use values and ecosystems at risk as primary considerations when managing to reduce the hazard of large-scale insect and disease infestations and severe wildland fires. Examples of values and ecosystems at risk include but are not limited to such things as public and firefighter safety, homes, communication sites, municipal watersheds, and threatened, endangered, sensitive species habitat.) Group Agreement: "Fire concern with bug-killed trees." "Institute a rating system to prioritize actions proposed." "Measure values at risk. Where do we concentrate our efforts? Commodity, human, environmental values, etc., and how do we prioritize?" "Can we prevent infestations through harvest?" "What are the economic influences and are they considered?" "Immediate danger is the first priority, but economics is also a consideration." (Group consensus -- no wording changes.) (Place Based Groups, Darby, MT - #829)

PC #: 590

Public Concern: The FS should protect and restore old growth forests, and recruit new old growth. The FS should establish old growth on one third of all watersheds.

Sample Statement:

MANAGEMENT RECOMMENDATIONS. To protect remaining old growth, provide for recruitment of future old growth, and link these currently small and isolated patches, the Citizen reVision provides the following management standards. Use the Old-Growth Forest Types of the Northern Region as a first step in identifying old growth stands. All existing old growth must be preserved. The Forest Service must calculate how much old growth there is on a watershed (i.e., approximately 10,000 acres) and forest-wide basis. Designate the existing old growth and future old growth, map it and connect these stands with linkages as described above. Place longer-rotation or less intensive uses adjacent to designated old growth. Integrate future recruitment old growth into the network. No logging should take place in old growth stands. Under limited and extraordinary circumstances some thinning of sapling and pole-sized timber less than 6 inches in diameter may be appropriate but only in ponderosa pine habitat type, without using heavy equipment, and when there are no adverse effects to old-growth dependent, management indicator, sensitive, threatened or endangered species. No salvage logging should take place in old-growth even if the stands burn in a forest fire. (Preservation/Conservation, Helena, MT - #341)

Sample Statement:

I do not want the Plan to include any bogging on what little old-growth forests remain and also to allow enough other forest to mature so that each watershed is at least one-third old-growth. (Individual, Kalispell, MT - #486)

Sample Statement:

EM-F4-A1: (We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.) Due to the precipitous decline in old-growth over the last few decades, all existing old growth should be retained. Stands should be identified for future old growth recruitment, especially in productive, low elevation areas. (Preservation/Conservation, Polebridge, MT - #705)

Sample Statement:

Action EM-F4-A1: (We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.) I believe that old growth should be left alone as much as possible. There is very little of it left, and we still don't fully understand the complexity of forest dynamics in this type of forest. "Allowing treatments" in old growth could be too broadly interpreted and could lead to additional roading or logging in old growth stands. Action EM-F4-A2: (We propose to allow treatments of old growth stands to maintain or restore old growth conditions and reduce threats from disturbances such as insects, disease, wind and fire. See comment above. Managers can't start manipulating old-growth forest without compromising native diversity.) (Individual, Bigfork, MT - #475)

Sample Statement:

I do not want the Plan to include any bogging on what little old-growth forests remain and also to allow enough other forest to mature so that each watershed is at least one-third old-growth. (Individual, Kalispell, MT - #486)

PC #: 589

Public Concern: The FS should conduct an HRV analysis for each forest, as opposed to the whole planning zone.

Sample Statement:

Action EM-F4-A1: (We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.)Because of the differences in climate, tree species and forest composition between the three forests there should be forest scale historical ranges developed instead of a 3 forest zone. One size fits all doesn't work. (Individual, Columbia Falls, MT - #673)

PC #: 592

Public Concern: The FS should only designate old growth for rare or endangered flora or fauna.

Sample Statement:

Action EM-F4-A1: (We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.)To our knowledge no laws or regulations require the 'restoration or maintenance' of Old Growth Conditions or that forests be 'returned to historical conditions'. Any areas dedicated to "old growth" management constraints should be for the purpose of enhancing conditions for some specific wildlife species or some rare and/or endangered flora or fauna. Such areas would seem to need to first be withdrawn from management and then classified as "unregulated timber." Management direction such as this is setting the forests up for appeals and lawsuits. Action EM-F4-A2: (We propose to allow treatments of old growth stands to maintain or restore old growth conditions and reduce threats from disturbances such as insects, disease, wind and fire.)Old Growth conditions may be required to maintain viable populations of some endangered species. These species to be protected by old growth conditions must be in the area, and identified as the prime reason for the old growth management. No other reason is valid. (Place Based Groups, Paradise, MT - #258)

PC #: 600

Public Concern: The FS should consider the HRV of old growth and approach these ranges within the capability of changed conditions.

Sample Statement:

Action EM-F4-A1 (We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.)Proposes management direction to consider the historic ranges of old growth and approach those ranges within the capability of changed conditions. First, I don't think you can look at historic ranges of old growth without looking at historic ranges of early and mid-seral stands also. At that point, it becomes obvious that trying to maintain historic ranges of old growth is not a preservation/recruitment issue, but an issue of trying to prevent detrimentally excessive amounts of old growth. Depending on the scale and location examined, historically old growth was something like 10 to 20 percent of the landscape. Currently, about 2/3 of the forested FS land in the western Montana zone is on the fast-track to becoming old growth by the end of the planning period (before the next revision). This includes the forested wilderness areas and various classifications of roadless areas where management, if any, is expected to be light. The remaining 1/3 of the zone is being managed at about a 200 to 250 year rotation. (Individual, Superior, MT - #687)

PC #: 601

Public Concern: The FS should use (harvest) all timber fiber, except where it is needed for wildlife and soil.

Sample Statement:

Action EM-F4-A1: (We propose to modify management direction for old growth, snags, and downed woody material to use consistent definitions. We propose to consider what the historical ranges were at the three forest zone or forest scale and approach those ranges within the capability of changed conditions such as invasive plant species, human development, and fire intensity.)Old growth definitions must be site specific. It cannot be forestwide or nationwide. All timber fiber must be used except where it is absolutely needed for wildlife, soil retention, and soil nutrients. That means harvesting dead and dying trees in special management zones with light on the land systems. The bottom line is that we cannot afford to waste our natural resources! It's just common sense! (Individual, Kalispell, MT - #781)